# Code of Conduct

## 1. Purpose

The purpose of this policy is to ensure we create and maintain a positive and effective environment both in terms of our fellow colleagues and the pupils and learners that we support by setting out the expectations we have of our staff, volunteers, agency workers and other representatives in relation to their conduct.

## 2. The Statutory guidance

This policy meets the requirements of:

- Keeping Children Safe in Education (KCSIE) (Updated Annually)
- Employment Rights Act 1996
- Employment Rights Act 2025
- Employment: Code of Practice
- Data Protection Act 2018
- The Equality Act 2010
- Health and Social Care Act 2008 (Regulated Activity) Amendment Regulations 2015
- Care Act 2014
- Mental Capacity Act 2005
- Charities and social media guidance, September 2023 Charity Commission
- Campaigning and Political Activity Guidance, November 2022 Charity Commission

## 3. Policy statement

At Ambitious about Autism (**AaA**) and Ambitious about Autism Schools Trust (**AaAST**), autistic children and young people are at the heart of everything we do. We champion their rights and create opportunities and have zero tolerance of any form of abuse or discrimination.

Whatever your role, you have a key part to play in ensuring that we uphold our values and maintain our reputation with our stakeholders. You are accountable for our work and for building and maintaining good working relationships with parents/carers, pupils/learners, all staff and workers and others within our community and in doing so you are required to operate with the highest standards of integrity and effectiveness.

This policy applies to all staff, volunteers and agency workers employed or engaged by AaA/AaAST. Other individuals, including our contractors, subcontractors and suppliers are also encouraged and expected to follow the procedures set out in this policy.

## 4. Key Principles

The following principles underpin the Code of Conduct Policy and are set out in Appendix 1. In summary, safeguarding and professional conduct is inherent throughout all practice, confidentiality, punctuality, appropriate dress, acceptable written and verbal language within the workplace, relationships at work, money and donations, use of resources, press and media interest, social media and mobile devise use, consumption of alcohol and drugs, conflicts of interest or loyalty, and political neutrality are included.

## 5. Roles and Responsibilities

- Trustees/Governors – are responsible for approving this policy and ensuring that senior leaders within AaA/AaAST lead by example on conduct and behaviour adhering to the standards set out in this policy and associated guidance.

- ELT/SMT/Managers - are responsible for ensuring members of their team and directorate follow the policy and procedures set out and that appropriate action is taken as outlined, should any breaches occur.

- Staff/volunteers/agency workers - are responsible for ensuring they understand and follow the Code of Conduct in relation to their roles and employment with AaA/AaAST.

- In addition to the Code of Conduct, any member of staff or agency worker who is a registered teacher, nurse, social worker or therapist is bound by their professional Codes of Conduct and Practice and must also act, at all times, in accordance with them. Adult Social Care workers can find further professional guidance in the Code of Conduct for Healthcare and Adult Social Care Workers in England. Teaching Assistants, Specialist Teaching Assistants, Higher Level Teaching Assistants and Senior Specialist Teaching Assistants can find further guidance in the Professional Teaching Assistants and Higher-Level Teaching Assistants Standards.

- People Team - is responsible for reviewing and updating the policy and procedures in line with relevant legislation, employment law and good practice and ensuring any updates to the policy are published on SharePoint and where required communicated via the appropriate channels.

- AaA/AaAST will ensure that any breaches of the Code of Conduct are dealt with in line with the Equality Act and failure to follow the Code of Conduct or other applicable professional Codes of Conduct and Practice is a serious matter and may lead to disciplinary action or referral to the relevant professional body.

## 6. Other Key Policies

This policy should be read alongside the following policies, which can be found on OneWorld under polices and procedures or requested.

- Behaviour
- Performance Improvement Process
- Data Protection
- Data Security
- Disciplinary
- Dignity at Work
- Alcohol & Drugs
- EDI
- Finance – Gifts & Hospitality
- Anti Bribery & Corruption Policy
- Conflict of Interest Policy
- Flexible Working
- Grievance
- Health & Safety Policy
- Hybrid Working
- ICT Acceptable Use
- Personal Protective Equipment Guidance
- Child protection and safeguarding
- Adult at risk and Safeguarding
- Prevent
- Social Media Policy
- Special Leave of Absence
- Restrictive Physical Intervention

## 7. Further Details

The summary of procedures to be followed in relation to the Code of Conduct can be found in Appendix 1.

## 8. Monitoring Arrangements

This policy will be reviewed by the Finance and Resources Committee and approved by the Joint Group Board Committee on a two-year cycle.

## Appendix 1 – Code of Conduct Procedure

### 1. Confidentiality

All information about pupils, learners, residents within our residential settings, their families or about staff, volunteers, supporters, partners or other stakeholders - however recorded including the use of mobile phones at work - is strictly confidential. It may only be used for the professional purposes for which they were gathered and may not be shared with third parties or other individuals except within the confines of a professional information exchange. If unsure as to whether a particular piece of information may be confidential, it is your responsibility to treat it as such and to seek advice from your line manager. You must follow the guidance as set out in the Data Protection and Data Security policies. Breach of either policy may lead to disciplinary action.

Any notes, photographs, reports or personal records that may be used as part of your day-to-day role must be stored securely and used for the purpose they were obtained only. They must be returned at the termination of any relevant project or at the end of your employment.

You might be responsible for managing or reviewing confidential information (for example pupil and learner records or residential care and support plans). You are responsible for ensuring that you maintain security of these records and do not take them from AaA/AaAST premises in line with the detailed protocols laid out in the Data Protection and Data Security policies. Failure to follow these procedures may lead to disciplinary action. You may be required to sign a confidentiality agreement as an essential requirement of your role.

### 2. Attendance and Punctuality

Good timekeeping is essential to ensure that pupils and learners are fully supported throughout the day, that all services run efficiently, that timetables and rosters within our settings are adhered to, and that all staff are treated fairly. Staffing levels must remain in line with the demands of AaA/AaAST at all times of the day, and night in residential settings. Repeated or persistent lateness will be viewed as misconduct.

Staff are responsible for ensuring that they record accurately the time they arrive at any of our premises.

Each staff members contract defines the minimum hours of work that they are contractually required to work, including start time, finish time and provision for breaks. Within our residential settings these will be reflected within the weekly shift roster.

- Staff should arrive at work early enough to enable them to begin work at their appointed start time.
- Similarly, staff are required to remain at work until the finishing time defined in their contracts, unless granted permission by their line manager to leave work before that time.
- It is accepted that some circumstances are outside the staff's control, for example if a traffic accident has caused long delays on the roads. However, a high volume of traffic causing delays that is a regular occurrence, or can reasonably be anticipated, will not be regarded as a valid reason for lateness.
- Staff also need to be aware of timekeeping while at work, with respect to meetings (for example, morning briefings at the schools, colleges and shift handovers within residential settings).

If a staff member is late to work, a meeting, or other work commitment:

- The line manager should speak to the staff informally (and privately) to establish the reason for the lateness, and how the staff might be supported to achieve improvement.
- The line manager/SLT at the settings will be responsible for keeping records of lateness.

Schools, Colleges and Residential Settings Staff:
If a staff member is likely to be late for work, they must call ahead before the contracted or agreed start time to explain the situation and give an estimated arrival time.

If staff have three or more occasions of lateness within any six-month period, AaA/AaAST will follow its disciplinary procedure.

Central Team staff:
All contracts of employment state staff's start time, and if flexibility is required on an ad hoc basis this must be agreed with your line manager.

Staff and line managers should be mindful of the service delivery and customer service needs of the organisation and ensure that a service is provided by the department during normal working hours.

Day-to-day ad hoc changes should be approved and monitored by line managers. Staff should make colleagues within their team aware of any variance in working patterns by noting this in their Outlook calendar.

If staff are likely to be late for work, they must call ahead before the contracted or agreed start time to explain the situation and give an estimated arrival time.

If staff have three or more occasions of lateness within any six-month period, this may lead to disciplinary action.

### 3. Dress Code

Clothing should be smart, practical, and appropriate to your role. Care should be taken that clothing is not revealing – this is particularly important for the pupils and learners we work with in the schools, colleges and residential settings.

The only parts of the body that can be acceptably exposed are:

a. Arms (shoulders should be covered)
b. Neck and face (chest should be covered)
c. Lower legs

Feet should be covered to protect you from injury (again this may depend on your role) e.g. by another person stepping on them, furniture, bikes running over feet. Footwear should be such that you are enabled to work directly with pupils and learners and to move swiftly and safely in all environments.

Hair should be tied back, where appropriate, and protective equipment worn, where required, to reduce the risk of injury. Staff working with pupils and learners should ensure that fingernails (natural or artificial/salon nails) should not be excessively long that they can cause injury.

Staff should not wear clothing with slogans inappropriate to their professional status and position as role models for children and young people, e.g. FCUK, or any reference to drug or alcohol use/abuse.

It is not acceptable to expose underwear at work.

Jeans and trainers or other casual clothes are acceptable for staff working directly with pupils and learners across all settings. There may be occasions (e.g. meetings with parents or Local Authorities) when smarter, business clothing should be worn. Staff are expected to adopt the style of dress appropriate to representing AaA/AaAST within a given forum, and to match their style of dress to the environment.

Jewellery can cause injury to pupils and learners, and it is not sensible to wear anything which may harm them or the wearer or anything that can be easily broken. Body piercings must be covered, ear

or facial piercings should be limited to simple studs within the workplace for all those staff working directly with pupils and learners.

Visible tattoos, unless part of the individual's faith, are not protected characteristics under the Equality Act 2010. However, AaA/AaAST values diversity and accepts that tattoos can be expressions of individuality. For this reason, visible tattoos are acceptable, providing they could not reasonably be interpreted as:

- discriminatory
- offensive
- likely to frighten pupils or learners
- indicative of attitudes or views which are inconsistent with AaA/AaAST's or relevant professional bodies, philosophies, standards or codes of conduct

Decisions about the appropriateness or otherwise of tattoos are for the relevant manager/SMT member within AaA/AaAST.

Inappropriate dress, tattoos or jewellery will be brought to the wearer's attention by their line manager and should be remedied as soon as is feasible and no later than the following day. In some cases, a staff member may be sent home. It is the responsibility of all the staff working with someone dressed inappropriately to bring this to the wearer's attention if they seem not to be aware (e.g. low-cut trousers that expose flesh when seated).

## 4. Press & Media

AaA/AaAST works to raise awareness and understanding of autistic children and young people and their families in the media and elsewhere. We are at times asked to comment on issues relating to our work or activities on-site and beyond. Such interest is generally welcomed. However, the messages that go out to the media must be carefully considered and should be in the very best interests of the organisation. Positive comments and open discussions can at times be distorted or misconstrued. For this reason, you must not talk directly to the media at any time without first contacting the External Affairs team.

## 5. Social Media and Use of Mobile Phones

Social media is essential to the success of communicating AaA/AaAST's work. It is important for some staff to participate in social media to engage with our audience, participate in relevant conversations and raise the profile of AaA/AaAST's work.

However, the difference between a personal and professional opinion can be blurred on social media, particularly if you're discussing issues relating to AaA/AaAST's work. AaA/AaAST's Social Media Policy sets out the standards we require of everyone to observe when posting as a representative of AaA/AaAST or posting as an individual with a personal view. Failure to comply may result in disciplinary action.

Each area AaA/AaAST will have different rules in relation to the use of personal and work mobile phones. These should be followed at all times. There are no access restrictions to any of our social media sites. However, when using the internet at work, it is important that staff refer to our ICT Acceptable Use Policy. You are permitted to make reasonable and appropriate use of personal social media activity during your lunch breaks.

AaA/AaAST has an active presence on a number of social media platforms including X (formerly Twitter), Facebook, LinkedIn and Instagram. We also recognise that social media platforms are used frequently by many staff. To protect staff, volunteers, beneficiaries, supporters and the reputation of AaA/AaAST, it is important that all staff understand and comply with the guidelines set out in the AaA/AaAST comprehensive Social Media Policy. Failure to comply may result in disciplinary action.

## 6. Whistleblowing

Whistleblowing happens when a staff member raises a concern about malpractice or a potentially dangerous activity, that they are aware of through their work or from colleagues and they raise the matter so that it may be investigated and where necessary corrected. It is important that concerns can be raised in a confidential manner with no detriment to the whistleblower. For this reason, AaA/AaAST has a Whistleblowing Policy in place, which outlines the steps to be taken by any staff member who wishes to raise a concern. Should the concern relate to a safeguarding matter, the safeguarding policies and procedures for protecting children and/or adults must be followed. When dealing with complaints from young people, families, suppliers, commissioners and education and /or health and social care professionals, staff should be mindful of any information which may need to be treated as a public interest disclosure and follow the procedure as set out within the Whistleblowing Policy.

## 7. Acceptable language at work

Language used in the workplace should be professional and considered (especially in areas where you are working with pupils and learners or which are open to the public). Sexist, racist, homophobic, abusive or any other language which does not promote fundamental British values ** is not acceptable. Swearing is not acceptable within the Schools or the Colleges, or anywhere on the premises or when you are representing AaA/AaAST on business. Residential settings are individual's homes and staff working within those settings are expected to adhere to this standard. Care should also be taken to avoid an intimidating workplace culture, including harassment, sexual harassment, bullying, bias and discrimination.

*** fundamental British values are upheld as part of the government's Prevent Programme and refers to: democracy, rule of law, individual liberty, mutual respect, and tolerance for those with different faiths.*

## 8. Spoken Language at work

AaA/AaAST is proud of the diversity and inclusion of all staff within the workplace and recognises the variety of languages spoken by our staff and our pupils and learners. However, within the workplace and in support of professional business practice, English is the spoken and written language to be used by all staff, pupils and learners.

## 9. Alcohol & Drugs

AaA/AaAST recognises the importance of health, including mental health and the welfare of its staff. We realise that the misuse of alcohol and drugs is a health problem and, as such, will be treated sympathetically.

AaA/AaAST staff attending fundraising and promotional events on behalf of AaA/AaAST are permitted to consume alcohol but must manage their consumption in a socially responsible manner.

However, attending work or social events outside of normal work hours when excessively under the influence of alcohol or drugs is likely to be considered as gross misconduct and appropriate disciplinary action may be taken. Please see the Alcohol and Drugs Policy for further information.

Smoking and vaping is not permitted within any AaA or AaAST buildings at any time. Smoking and vaping must be done within designated areas outside the building.

## 10. Money & Donations

Staff should never put themselves under any financial obligation to individuals or organisations that might influence them in their judgement or performance of their duties.

AaA/AaAST receives public and private funds to support its work and has a duty to fully account for these resources properly and effectively. You have a duty to comply with the financial procedures as

laid out and appropriate to your role. All financial transactions must be properly authorised and recorded, and wasteful or unnecessary expenditure must be avoided at all times.

All staff must comply with the Bribery Act 2010, please refer to the Anti Bribery and Corruption Policy. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone, or if they request, agree, accept or receive a bribe from another person. If a member of staff believes that a colleague has failed to comply with the Bribery Act, they can report this using the Whistleblowing policy.

From time-to-time staff may receive gifts including from funders, suppliers or parents. To ensure the highest standards of probity any gift, regardless of value, must be notified to your line manager or team lead in accordance with the Gifts and Hospitality policy.

## 11. Resources

Valuable equipment must be stored and secured appropriately as directed. We all have a duty to ensure that good care is always taken of property and finite resources. This includes all items in your care, for example work mobile phones, tablets, laptop computers and other supporting equipment.

## 12. Relationships at Work

### Pupils and learners (including residential learners)

The Ambitious Approach to education, applied in our schools and colleges, requires all policy and practice to afford our pupils/learners to be treated with dignity, compassion, to be valued, listened to, supported to have the best quality of life possible, and empowered to make choices and decide on how they want to live their life.

Restrictive Physical Intervention (**RPI**), both planned and unplanned, can undermine dignity, respect and compassion its use should be minimised in line with the RPI Policy. Interventions when used must be carried out according to the principles and guidance as set out in training. Only staff who have undergone CALM or Maybo accredited training in physical intervention can use it. Where agency staff are employed, they are not allowed to physically intervene. The one exception to this rule is that staff can intervene and use reasonable force to prevent pupils/learners from hurting themselves or others.

Any intervention aimed to deliberately punish a learner/pupil, or which is primarily intended to cause pain, injury or humiliation is unlawful and will be considered an act of gross misconduct. Examples of this include hitting, pushing, slapping, kicking, poking, prodding, name calling or emotionally abusing a pupil/learner. Staff who engage in any such act would render themselves liable for dismissal and being referred to the Disclosure and Barring Service, Police and Local Authority Designated Officer.

### Parents and carers

Relationships with parents and carers must always remain professional. Staff should ensure that they do not develop personal relationships that could compromise the essential professional relationship. Communications between parents/carers and staff should, in almost all situations, take place during working hours, and should be framed in a positive and professional manner. Staff personal telephone numbers must not be given to parents and carers. School and college staff should never discuss pupils or learners with the parents and carers of another pupil/learner unless it relates to a specific issue that needs to be resolved as arises from time to time. Further guidance on professional boundaries appropriate to individual roles will be provided by line managers, Head of school, college or residential service.

### Trustees and Governors

Relationships with Trustees and Governors must always remain professional. Staff must ensure that they do not develop personal relationships with Trustees or Governors that could affect their

professional relationship. Staff must not discuss individual pupils, learners or residents with Trustees or Governors except where essential for professional reasons.

**Staff & team**

AaA/AaAST recognises that work is demanding and at times can be stressful. Good supportive relationships between colleagues are essential. Staff are therefore expected to treat each other with respect, being helpful and polite to all those with whom they have contact with. Intolerance and harassment are not acceptable and will be treated seriously. AaA/AaAST is committed to operating in such a way as is compatible with confidentiality. In return, staff are expected to display a positive attitude at work.

All personal information about staff and volunteers or about those applying for roles at AaA/AaAST should remain confidential and only shared where necessary and in line with GDPR.

All staff are encouraged to offer each other positive feedback, constructive criticism and support. It is not acceptable to criticise a colleague or a volunteer in front of a pupil, learner or resident or their family or in front of a representative of another organisation. Communication should remain courteous and respectful with all other members of staff.

Should a grievance or dispute arise between colleagues the organisation's grievance, or disciplinary procedures will be used as appropriate. Guidance in their use emphasises the importance of aiming to resolve such difficulties with more informal, open dialogue and mediation arrangements, which may involve your line manager in the first instance, rather than moving directly to more formal procedures. This approach will only be appropriate in some cases.

**13. Personal relationships at work**

AaA/AaAST recognises that staff who work together may form personal friendships and, in some cases, close personal relationships. While AaA/AaAST does not wish to interfere with these personal relationships, it is necessary for AaA/AaAST to ensure that all staff behave in an appropriate and professional manner whilst at work. The following principles have therefore been devised and apply to all staff regardless of their job or level of seniority.

- Any staff who is involved in a close personal relationship with a colleague, contractor, client, customer or supplier must not allow that relationship to influence their conduct while at work. Intimate behaviour during work time, for example kissing, touching or holding hands, is expressly prohibited. This rule applies during all working time, whether at the normal workplace, on clients' premises or elsewhere. Any breach of this rule will be regarded as a disciplinary offence leading to disciplinary action.

- Any staff who embarks on a close personal relationship with a colleague working in the same department or setting must declare the relationship to their manager and in turn to the Head of the setting. If the relationship is between a manager/supervisor and staff whom they supervise, the relationship should be declared to a senior manager. The information declared will be recorded on the personal files of both staff and treated in strict confidence.

- To avoid a situation in which staff has managerial authority over another with whom they have a close personal relationship, the organisation reserves the right to transfer one or both of the staff involved in the relationship to a job in another department/section. In these circumstances, the organisation will consult both of the staff and seek to reach a satisfactory agreement regarding the transfer of one or both of them.

- In such a situation, if it is not possible to transfer at least one of the staff (for example if no suitable vacancies exist, or if the staff refuse to transfer), the organisation reserves the right to dismiss one or both staff (with notice in accordance with the staff's contract or pay in lieu of notice). Dismissal

would, however, be undertaken only as a last resort in circumstances where no other course of action was reasonably open to the organisation.

- Similar principles apply to staff who begin a close personal relationship with a client, customer, contractor or supplier. If the staff's job allows them authority over the client, customer, contractor or supplier (for example if the staff has the authority to decide to whom to award contracts), the relationship must be declared to the staff's manager. In these circumstances, the organisation reserves the right to transfer, or as a last resort to dismiss, the staff following consultation with them.

## 14. Conflict of Interest or Loyalty

Please refer to the Conflict of Interest Policy for further guidance. You will devote the whole of your time, attention and skills to the business and affairs of AaA/AaAST. Any paid or voluntary work undertaken outside of AaA/AaAST must have the prior agreement of your line manager, and written approval from the divisional ELT member. "Conflict" for the purposes of this clause is understood to include both conflicts as to the nature of the work/activities undertaken and also as to the amount of time entailed. Any breach of this clause may render you liable to serious disciplinary action, which could result in your summary dismissal if the circumstances so warrant.

It is a condition of your employment that you do not provide voluntary or paid assistance to parents/carers of AaA/AaAST pupils, learners or residents or visit their homes without the prior agreement of your line manager and written approval from a divisional ELT member of AaA/AaAST. Any assistance provided under such approval shall be deemed to have been provided in your capacity as an individual and not as staff of AaA/AaAST.

It is also a condition of your employment that you do not, during your term of employment, without AaA/AaAST prior written consent, directly or indirectly trade or carry on a profession on your own account or in partnership with any other person or persons or act as servant, agent, or officer of any other person, firm, company or organisation without the prior agreement of the line manager and written approval of the divisional ELT member.

## 15. Political impartiality/neutrality

AaA/AaAST are not political organisations and do not hold a view on party politics or have any affiliation with or links to political parties. When representing AaA/AaAST, staff are expected to hold a position of neutrality. Staff who are politically active in their spare time need to be clear in separating their personal political identity from AaA/AaAST and understand and avoid potential conflicts of interest. The External Affairs team will provide staff with practical guidance during general election campaigns to help staff understand how to stay compliant with this policy.

You are expected to act impartially in relation to political parties. It is a matter of professional discipline that any personal party-political allegiance does not influence our work.

You must separate work use of social media and personal use of social media if you want to discuss your support or otherwise of political parties or candidates, including those who support or do not support particular policy issues. Individuals should be mindful of how such personal use could reflect on the organisation's image and act responsibly to avoid any damage to the organisation's reputation. (Please refer to the Social Media and External communications policies).

Staff must refrain from offering personal opinions via AaA/AaAST's social media accounts, either directly by commenting or indirectly by 'liking', 'sharing' or 'retweeting'. If you are in doubt about AaA/AaAST's position on a particular issue, please speak to the External Affairs team. This is the rule no matter when you are posting. However, please note that there is even more scrutiny of what is posted from our accounts in an election period. Specific guidance will be provided to staff by the External Affairs team during election periods.

Staff who have a personal blog or website which indicates in any way that they work at AaA/AaAST should discuss any potential conflicts of interest with their line manager and the External Affairs team. Similarly, staff who want to start blogging and wish to say that they work for AaA/AaAST should discuss any potential conflicts of interest with their line manager and the External Affairs team.

Those in senior management and specialist roles, where they are well known in their field of expertise, must take particular care as personal views published may be misunderstood as expressing AaA/AaAST's view.

A vital part of AaA/AaAST's political impartiality is maintaining the public perception of it. That is why it is important that staff in senior roles who speak on behalf of the organisation and those involved in our organisation's campaigning and policy work do not hold or stand for office with a political party at the same time. This applies to, but is not limited to, Trustees, Chairs of Governors, members of the Executive Leadership Team, and members of the organisation's policy and campaigns team.

Any staff member who wishes to stand for election to local government, the UK Parliament, Scottish Parliament, Welsh Parliament, Northern Ireland Assembly, London Assembly or as a local mayor or Police and Crime Commissioner must seek approval from the Director of External Affairs and Development to ensure there is no conflict of interest.