

GLC Staff Code of Conduct

This Policy was ratified by the Board of Directors on :	Spring 2026
This Policy will be reviewed by the GLC Board on :	Spring 2028

GLC Mission Statement

The GLC's mission is to develop active and thriving citizens within a diverse, truly fair and equal community.

This will be achieved through:

- High quality teaching that deliberately develops competencies of curiosity, creativity, communication and critical-thinking;
- An inspiring and meaningful curriculum;
- The development of productive relationships by instilling the values of compassion, resilience, responsibility and aspiration to prepare our young people for learning and life;
- A commitment to the wellbeing of our staff;
- A culture of professional generosity, collaboration, challenge and support throughout the GLC;
- The development of effective external partnerships for the benefit and wellbeing of our community.

Equalities Statement

The GLC's commitment to equality is enshrined in our mission statement to develop 'active and thriving citizens within a diverse, truly fair and equal community'.

We are a vibrant, innovative and successful organisation: we work hard to be the place of choice to work and to learn. Across the 5 academies of the GLC, we pledge that everyone enjoys an equality of opportunity. We work tirelessly to ensure that individual characteristics including age, ethnicity, socio-economic background, academic ability, disability, gender, religious beliefs, sexual orientation are not discriminated against in any way. We create inclusive environments characterised by mutual respect where difference is celebrated.

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GLC Staff Code of Conduct

1. Introduction

The overriding expectation is that all staff, volunteers and those engaged to work at any of the GLC academies will adopt the highest standards of personal integrity and conduct both in and outside of work. Academy staff are in a unique position of influence and must adhere to behaviour that models the highest possible standards for all pupils within the GLC Trust. As a member of the GLC, each staff member has an individual responsibility to maintain their reputation and the reputation of their academy and Trust, whether inside or outside of working hours.

Please note that this Code of Conduct is not exhaustive. If situations arise that are not covered by the code, staff will use their professional judgement and act in the best interests of their pupils, staff, academies and Trust.

This code should be read in conjunction with:

- Other GLC policies and procedures;
- The terms of employment or service contracts and agreements;
- Relevant professional standards.

2. Scope

This Code applies to all individuals employed by the school or those engaged by the school including:

- Relief/casual staff;
- Supply staff;
- Third parties providing services to the school [including the self-employed];
- Voluntary workers

For the purpose of elements of this code applying to all individuals set out above, they are collectively referred to as “workers”.

3. Roles and responsibilities

3.1 Board of Directors

It is the responsibility of the Board of Directors and Governors to establish and monitor standards of conduct and behaviour within the GLC Academies, including the establishment of relevant policies and procedures.

Directors and Governors are subject to their own Code of Conduct.

3.2 CEO and Heads of School

It is the responsibility of senior GLC staff to promptly address any breaches of good conduct and behaviour, using informal procedures where possible but implementing formal procedures where necessary.

3.3 Employees

It is the responsibility of all GLC employees to familiarise themselves, and comply with this policy and all procedures, conditions of service and relevant professional standards.

Any breaches of this Code of Conduct Policy will be regarded as a serious matter which could result in disciplinary action, and in certain circumstances could potentially lead to dismissal.

3.4 Engaged workers/Volunteers

Engaged workers and volunteers are required to familiarise themselves, and comply, with this Code so far it is relevant to their role. Any breaches of this Code may result in the engagement of the worker/volunteer being terminated, in accordance with any applicable terms of engagement.

4. Reporting breaches of Standards of good conduct

The GLC wishes to promote an open environment that enables individuals to raise issues in a constructive way and with confidence that they will be acted upon appropriately without fear of

recrimination.

All employees, engaged workers and volunteers are expected to bring to the attention of an appropriate manager/Governing Board/Trustee any impropriety, deficiency in the provision of service or breach of policy or this Code. Where appropriate, individuals should also refer to the School's Whistleblowing Policy which is available from the school office.

5. Safeguarding and Child Protection

It is essential that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. Adults must be clear about appropriate and safe behaviours for working with children in paid or unpaid capacities, in all settings and in all contexts, including outside work.

The relevant requirements specific to safeguarding and child protection are set out in:

- The school's Child Protection and Behaviour Management Policies and Procedures;
- The Department for Education Statutory Guidance "Keeping Children Safe in Education" [as amended from time to time].

This is the key statutory guidance which all employees must follow and all employees and volunteers must, as a minimum, read Part 1 of that Document. Staff working in central services who do not have any contact with pupils may read the abridged version at Appendix A .

"Guidance for Safer Working Practice for those working with Children and Young People in Education Settings" issued by the Safer Recruitment Consortium sets out key expectations for adult interactions with children and young people – the full guidance is available [here](#).

In addition, individuals should be aware that it is a criminal offence [s 16. Sexual Offences Act 2003] for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual.

Individuals should familiarise themselves with these documents, in conjunction with the body of the Code of Conduct and other relevant GLC policies and procedures.

5.1 Identifying and Reporting safeguarding concerns

Safeguarding concerns cover a wide spectrum from serious issues where a child is harmed or is at risk of harm to lower- level concerns where practice or behaviour is inappropriate, undesirable or not in keeping with usual expectations.

As part of our whole Trust approach to safeguarding, we promote a culture of openness, trust and transparency in which safeguarding is a shared responsibility and our values and expectations are lived, monitored and reinforced by all staff. In this context, everyone is expected to report any and all safeguarding concerns, no matter how small, as soon as they arise. This includes an expectation of self-reporting where an individual finds themselves in a situation which may be, or appear to be, compromising or where they have fallen short of expectations.

Who to report to

All child protection and or safeguarding concerns should be reported to the appropriate GLC academy Designated Safeguarding Lead immediately. See The GLC Safeguarding policy which explains how all disclosures are dealt with at each GLC academy. Posters identifying the DSL and their deputy will be displayed throughout each GLC academy.

Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

5.2 Where Children have been harmed or may be at risk of harm

Where a concern or allegation suggests that an adult has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or;
- Possibly committed a criminal offence against or related to a child, and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children,

The matter must be dealt with in accordance with the Dealing with Safeguarding Allegations against Adults Procedure, as required by Keeping Children Safe in Education.

5.3 Low Level Concerns Policy

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging’ doubt with the code of conduct, including inappropriate conduct outside of work [see 6 below] Examples of such behaviour could include, but are not limited to:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone, contrary to GLC policy;
- Crossing boundaries between familial and employment/volunteering roles;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or;
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Our objective is to protect our young people and adults, by identifying issues and providing advice, direction and support to improve our collective and individual practice.

In this regard we want all adults, as well as pupils, to feel empowered and confident to report all concerns in the knowledge that they do so on a neutral basis and that issues raised will be dealt with in a sensitive and proportionate manner.

All low-level concerns will be taken seriously, investigated and may be dealt in the following ways as appropriate:

- Additional support and/or training;
- Provision of advice, guidance or direction either verbally or in writing;
- Through performance management, or in cases of serious poor performance, the Capability Procedure;

Where there has been a breach of the code of conduct or disciplinary rules, through the Dealing with Safeguarding Allegations against Adults and/or Disciplinary Procedures.

To support our objectives, confidential records of all reported concerns and actions taken will be kept to identify any patterns, enable monitoring and to facilitate improvement in policy and practice.

6. Conduct outside work

The school recognises and respects individuals’ right to a private life without interference. However, individuals connected with the school must not act in a way that would bring the school, or their profession, into disrepute or that calls into question their suitability to work with children. This covers:

- Relevant criminal offences, such as violence or sexual misconduct;
- Inappropriate behaviour such as lewd or offensive action;
- Negative comments about the school or its community;
- Personal relationships which may present a risk by association.

Workers must disclose to the school [Head of School and in the case of the Head of School/CEO to the Chair of Board] immediately, any wrongdoing or alleged wrongdoing by themselves [regardless of whether they deny the wrongdoing/alleged wrongdoing], including any incidents arising from alternative employment or outside of work which may have a bearing on their employment or engagement with the school.

Employees should also refer to the expectations set out in their contract of employment and the disciplinary procedures.

Where a person engaged to work at the GLC is in a close personal relationship with a person who may pose a risk to children [e.g. a registered sex offender], this must be disclosed to the Head of School on a confidential basis so that appropriate measures can be put in place to protect the worker and the school.

In addition, any worker engaged in a post covered by the Childcare [Disqualification] Regulations 2009 [“the Regulations”] must immediately inform the school of any events or circumstances which may lead to their disqualification from working in the post by virtue of the Regulations. The statutory guidance relating to Disqualification under the Childcare Act 2006 can be found at the following link: <https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006#disqualification-under-the-childcare-act>.

6.1 Secondary employment

The GLC does not seek to unreasonably preclude employees from undertaking additional employment but employees are required to devote their attention and abilities to their duties at the academy during their working hours and to act in the best interests of the school at all times. Accordingly, employees must not, without the written consent of the school, take secondary employment or engagement once in post. This does not apply to those whose net average weekly earnings are at or below the lower earnings limit, although they should advise the school of any secondary employment so that the employer can have regard to any responsibilities it may have in relation to the Working Time Regulations.

Secondary employment or engagement must not interfere with the performance of the employee’s duties with this employer. In addition, employees should not engage in business or employment activities which are incompatible with or might conflict with the school’s interests.

7. Confidentiality

Confidential information can take various forms and be held and transmitted in various ways e.g. manual records [files, reports and notes], verbal discussions and electronic records. As a general rule, all information received in the course of employment or whilst volunteering/being engaged by the school, no matter how it is received, held or transmitted, should be regarded as sensitive and confidential and must not be disclosed or divulged within or outside the GLC other than in accordance with the requirement of the role and/or where specific permission has been provided.

NOTE: All workers must be aware that they are obliged to disclose information relating to child protection issues and should make it clear to the individual either that confidentiality cannot be guaranteed and/or decline to receive the information and direct them to a more appropriate person e.g. the Designated Safeguarding Lead.

The GLC is committed to being transparent about how it collects and uses the personal data of its workforce, and to meeting its data protection obligations. The Data Protection Policy sets out the school’s commitment to data protection, and individual rights and obligations in relation to personal data.

Any actual or suspected/potential breach of data protection must be reported immediately to the school’s Data Protection Officer.

7.1 Preserving anonymity

The Education Act 2011 contains reporting restrictions preventing the publication of any material which could lead to the identification of a teacher in the event of an allegation against them made by a pupil at

the same school. Any individual who publishes material which could lead to the identification of the employee who is the subject of an allegation of this kind may be subject to criminal and disciplinary action, up to and including dismissal.

“Publication” includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public. For the avoidance of doubt, this includes publishing details of an allegation or other information on a social media site which could lead to the identification of the teacher.

7.2 Media queries

Workers must not speak to the press or respond to media queries on any matter relating to the school. All media queries should be referred immediately to the Head of School/CEO/Chair of Board.

8. Use of computers, email and the internet and social media

The school recognises that electronic devices and media are important tools and resources in an educational context and can save time and expense.

Those using the school’s equipment and networks are expected to do so responsibly and to comply with all applicable laws, policies and procedures, and with normal standards of professional and personal courtesy and conduct.

Personal use of social media and other on-line applications which may fall into the public domain should not be such that it could bring the school into disrepute and/or call into question an individual’s suitability to work with children.

Detailed expectations are set out in the Acceptable Use Policy at Appendix B.

Any worker who is unsure about whether or not something he/she proposes to do might breach that policy or if something is not specifically covered in the policy, they should seek advice from their line manager or a member of the Senior Leadership Team.

9. Relationships

9.1 The internal GLC community

All workers are expected to treat members of the GLC community with dignity and respect and to work co-operatively and supportively. Bullying, Harassment and Victimisation will not be tolerated [see also the school’s Grievance Procedure].

9.2 The wider community and service users

All workers have a responsibility to ensure courteous, efficient and impartial service delivery to all groups and individuals within the community. No favour must be shown to any individual or group of individuals, nor any individual or group unreasonably excluded from, or discriminated against, in any aspect of school business.

9.3 Contracts

All relationships of a business or private nature with external contractors, or potential contractors, must be made known to the GLC Board. Orders and contracts must be in accordance with standing orders and financial regulations of the GLC. No special favour should be shown to businesses run by, for example, friends, partners or relatives in the awarding of contracts, tendering process or any other business transaction.

9.4 Gifts and Hospitality

Workers may not accept any gift or hospitality from a person intended to benefit from their services [or those whom they supervise] or from any relative without the express permission of the school.

Where an outside organisation wishes to sponsor or is seeking to sponsor a school activity, whether by invitation, tender, negotiation or voluntarily, the sponsorship should always be related to the school's interests and never for personal benefit.

9.5 **Neutrality**

Workers must not allow their own personal, political, religious or other views and opinions to interfere with their work. They are expected to be neutral in their views in the course of their work at the school and to present a balanced view when working with pupils.

10. **Close personal relationships at work**

Close personal relationships are defined as:

- Workers who are married, dating or in a partnership or co-habiting arrangement;
- Immediate family members for example parent, child, sibling, grandparent;
- Other relationships for example extended family [cousins, uncles, in-laws], close friendships, business associates [outside the school].

It is also recognised that situations arise where close personal relationships can be formed at work.

10.1 **Applicants**

Applicants are required to disclose on their application form if they have a close personal relationship with any person connected with the GLC.

Applicants are asked to state the name of the person and the relationship. Failure to disclose such a relationship may disqualify the applicant.

Workers should discuss confidentiality with their Head of School/line manager, any relationships with an applicant.

It is inappropriate for any worker to sit on an appointment panel, for those with whom they have a close personal relationship.

10.2 **References**

It is expected that, for those working with children, professional references, and not personal references, are sought and provided. All references provided on behalf of the school must be signed by the Head of School [CEO for the Head of School and Chair of the Board for the CEO].

Anyone agreeing to act as a personal referee must make it clear in the reference that it is provided as a personal or colleague reference and is not a reference on behalf of the school. Personal or colleague references must not be provided on school headed paper.

10.3 **General Conduct**

No-one should be involved in discipline, promotion, pay or other decisions for anyone where there is a close personal relationship.

Intimate behaviour during work time, in any workplace, such as holding hands, kissing, other close physical contact and discussions of a sexual nature is not permitted.

Unwanted sexual advances or harassment will not be tolerated and will lead to disciplinary action.

10.4 **Disclosure**

All close personal relationships should be disclosed, in confidence, to the line manager/supervisor by the individuals concerned as this may impact on the conduct of the school.

Whilst not all such situations where those in close personal relationships work together raise issues of conflict of interest, implications can include:

- Effect on trust and confidence;
- Perception of service users, the public and other employees on professionalism and fairness;
- Operational issues e.g. working patterns, financial and procurement separation requirements;
- Conflicting loyalties and breaches of confidentiality and trust.

Open, constructive and confidential discussion between workers and managers/supervisors is essential to ensure these implications do not occur and that all parties can be protected.

It may be necessary in certain circumstances to consider transferring workers that form close personal relationships at work. Any such action will be taken wherever possible by agreement with both parties and without discrimination.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from all forms of bullying, harassment, including sexual harassment, victimisation and discrimination.

Colleagues who feel they are affected by a close personal relationship at work involving other colleagues should at all times feel that they can discuss this, without prejudice, with their Head of School/line manager/CEO, other manager or GLC Board of Directors.

If you find yourself in a situation where you are bullied or harassed while you are at work, including where a personal relationship has broken down, we encourage you to report this immediately and to follow our Grievance Procedure.

10.5 Workers related to pupils

Any workers related to, or who are the carer of a pupil are expected to separate their familial and employment role.

Workers must not show or provide any preferential treatment to them or become involved in their education or care beyond their specific role as an employee/volunteer or their role as a parent/carer/relation.

11. Dress code

Dress Code for Staff [Other Than Training and Non-Uniform Days]

Dress and personal appearance present visual codes to students, parents and other visitors to the GLC. They convey a sense of professionalism and present a sense of purpose; as such, they contribute to the ethos of the organisation. If we are to have high expectations of students' dress, this must be reflected in the dress of staff. Appropriate dress must be worn at all times. If clothing fails to meet the standards of professional dress, the employee will be asked not to wear the inappropriate item to work again.

The following guidelines are intended as an aid in maintaining a professional appearance:

- Unless staff are required to wear specific clothing for health and safety reasons, religious observance, or the specific requirement of teaching a lesson [e.g. PE or Dance], dress will be professional.
- Trousers will be smart, full, or 3/4 length and will exclude cords, cargo pants and any colour denim [this applies to both male and female staff]. Leggings are permissible only if they are covered by a long-line tunic top and are professional in appearance.
- See-through clothing, fishnet fabrics, halter-tops, off-the-shoulder, spaghetti/shoestring strapped tops, low-cut tops, short skirts and bare midriffs are not considered to be appropriate work-wear for a school environment.
- Male members of staff at the Gateway Academy [with the exception on PE staff] should wear ties and a collared shirt. Ties at primary are optional depending on the circumstances.
- All staff should wear appropriate shoes bearing in mind their own health and safety and that of others. Footwear in the style of Ugg boots, casual/backless sandals including flip-flops or similar are not deemed appropriate. Bare feet are also not appropriate for health and safety reasons. Smart trainers are permitted and should be plain, with a flat sole and professional looking. Staff choosing to wear trainers should consult with the examples in Appendix D. It is not appropriate to wear high tops, chunky trainers, converse or running-style trainers.

- Shorts are only appropriate for the teaching of PE and Dance.
- The wearing of jewellery items should not be excessive and worn in a manner that is not likely to distract students from learning. Jewellery must also not be a potential health and safety hazard such as large hoop earrings.

Non-Uniform Days: Staff can wear casual clothes however they must dress in a manner and style that is appropriate, still taking account of health and safety considerations and the fact that we are in a school environment.

Trips: If pupils are wearing school uniform, staff will be expected to follow the dress-code as if it were a typical working day. If pupils are wearing non-uniform, then the 'non-uniform days' guidance above should be followed.

12. Use of financial resources

Workers must ensure that they use public and any other funds entrusted to them in a responsible and lawful manner. They must strive to ensure value for money and ensure rigorous adherence to Financial Regulations.

13. School property and personal possessions

Workers must ensure they take due care of school property at all times, including proper and safe use, security, appropriate maintenance and reporting faults. If employees are found to have caused damage to school property through misuse or carelessness this may result in disciplinary action.

Workers are responsible for the safety and security of their personal possessions while on school premises. The school will not accept responsibility for the loss or damage of personal possessions.

14. Lone Working

Sometimes it is necessary for staff to work alone, a lone worker is a person who is working at a time or place when no other work colleagues are present. This could be inside or outside of a GLC Academy. Lone working is not unique to any particular groups of staff, working environment or time of day.

It is essential that all staff feel safe and secure, so that they can perform their duties free from fear and in the full knowledge that there are strong management procedures in place to ensure that effective action can be taken, should they find themselves in a threatening environment and need help. However, staff also have a responsibility for maintaining their own personal safety and that of others.

Managers are responsible for ensuring that lone workers for whom they are responsible are not placed at increased risk. Where staff undertake lone working, managers must ensure that structures and procedures are in place and adhered to in order to demonstrate as far as is reasonably practicable, that staff are safe if something untoward occurs.

Members of staff are responsible for reporting any incidents relating to lone working and undertaking risk assessments, so that risks can be identified and suitable measures developed to control those risks as far as is reasonably practicable.

The need for staff to work on their own in or out of normal hours should be discussed with their line manager. Some of the factors that need to be addressed within the risk assessment include:

1. Communications [how to summon assistance, if required];
2. Is anyone notified that there is a lone worker in the area;
3. Is the line manager aware that the person will be working alone, especially if outside normal working hours;
4. What emergency arrangements in addition to existing ones are required, if any;
5. Are the means of access to the area adequately controlled to prevent unauthorised access;
6. Are those activities being carried out suitable for one person?

Appendix A

Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings

Below are the key expectations set out in the Guidance. A copy of the full document can be accessed: [Guidance for safer working practice for those working with children and young people in education settings February 2022](#)

The following should be read in conjunction with the body of the Code of Conduct and other relevant academy policies and procedures.

1. Duty of Care

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical and emotional harm. Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of pupils. Failure to do so may be regarded as professional neglect.

The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

This means that adults should:

- Understand the responsibilities, which are part of their employment or role;
- Always act, and be seen to act, in the child's best interests;
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Take responsibility for their own actions and behaviour.

2. Making a Professional Judgement

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for adults in all circumstances. There may be occasions and circumstances in which adults have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to seek advice wherever possible prior to acting, or in an emergency, to make judgements to secure the best interests and welfare of the children in their charge. Such judgements should always be recorded and shared with a member of the senior management team and with the parent or carer. In undertaking these actions individuals will be seen to be acting reasonably.

3. Power and Positions of Trust

Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity.

A relationship between an adult and a child or young person is not a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

4. The Use of Personal Living Space¹

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No child or young person should be in or invited into, the home of an adult who works with them, unless the reason for this has been firmly established and agreed with parents/carers and a senior manager or Heads of School.

Under no circumstances should pupils assist with chores or tasks in the home of an adult who works with them. Neither should they be asked to do so by friends or family of that adult.

5. Gifts, Rewards and Favouritism

The giving of gifts or rewards to pupils should only be part of an agreed policy for supporting positive behaviour or recognising particular achievements.

The giving of gifts is only acceptable practice where, in line with the agreed policy, the adult has first discussed the giving of the gift and the reason for it, with the Heads of School, senior manager and the parent or carer and the action is recorded. Any gifts should be given openly and not be based on favouritism.

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to clear, agreed criteria.

There are occasions when children, young people or parents wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thank-you and this is acceptable. It is inappropriate to receive gifts on a regular basis or of any significant value.

6. Infatuations

Occasionally, a child or young person may develop an infatuation with an adult who works with them. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.

An adult, who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with a Head of School or senior manager and parent/carer so appropriate action can be taken to avoid any hurt, distress or embarrassment.

7. Communication with Pupils [including the Use of Technology]

Communication between pupils and adults, by whatever method, should take place within clear and explicit professional boundaries as set out in this Code of Conduct and relevant IT policies.

Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child/young person, other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Adults should also be circumspect in their communications with children so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to pupils including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents/carers.

E-mail or text communications between an adult and a child young person outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet based web sites.

8. Social Contact

Adults should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a

response. There will be occasions when there are social contacts between pupils and staff, where for example the parent and teacher are part of the same social circle. These contacts however, will be easily recognised and openly acknowledged.

Nevertheless, there must be awareness on the part of those working with children and young people that some social contacts, especially where these are not common knowledge can be misconstrued as being part of a grooming process. This can also apply to social contacts made through outside interests or through the staff member's own family. It is recognised that staff can support a parent who may be in particular difficulty. Care needs to be exercised in those situations where the parent comes to depend upon the staff member for support outside their professional role. This situation should be discussed with senior management and where necessary referrals made to the appropriate support agency.

9. Sexual Contact

All adults should clearly understand the need to maintain appropriate boundaries in their contacts with pupils. Intimate or sexual relationships between children/young people and the adults who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action. All children and young people are protected by specific legal provisions in this respect regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.

10. Physical Contact

Any physical contact should always be in line with the GLC's policy on behaviour management and physical contact.

Generally:

- When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- Staff should therefore, use their professional judgement at all times.
- Unusual incidents should be recorded as soon as possible in the GLC academy's incident book and, if appropriate, a copy placed on the child's file.
- Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and – so far as is possible - use a level of contact and/or form of communication which is acceptable to the child for the minimum time necessary.
- Children with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.
- In circumstances where a child or young person initiates inappropriate physical contact, it is the responsibility of the adult to sensitively deter the child and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with a senior manager and the parent/carer.
- Physical intervention should only be used to manage a child or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances.

11. Children and Young People in Distress

There may be occasions when a distressed child needs comfort and reassurance and this may involve physical

contact. Young children, in particular, may need immediate physical comfort, for example after a fall, separation from parent etc. Adults should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

Where an adult has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with a senior manager and parents/carers.

12. Intimate Care

Some job responsibilities necessitate intimate physical contact with children on a regular basis, for example assisting young children with toileting, providing intimate care for children with disabilities or in the provision of medical care. The nature, circumstances and context of such contact should comply with professional codes of practice or guidance and/or be part of a formally agreed plan, which is regularly reviewed. The additional vulnerabilities that may arise from a physical or learning disability should be taken into account and be recorded as part of an agreed care plan. The emotional responses of any child to intimate care should be carefully and sensitively observed, and where necessary, any concerns passed to the Head of School or senior managers and parents/carers.

All children have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity should be encouraged to act as independently as possible.

The views of the child should be actively sought, wherever possible, when drawing up and reviewing formal arrangements. As with all individual arrangements for intimate care needs, agreements between the child, parents/carers and the school/service must be negotiated and recorded.

13. Personal Care

Young people are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations.

This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Adults need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils with whom they work.

14. First Aid and Administration of Medication

Medication and First Aid must only be administered in accordance with school policies.

15. One to One Situations/Home visits

Where there is a need for an adult and young person to be alone together or for an adult to visit a young person's home this should be within recognised policies and procedures.

Pre-arranged meetings with pupils away from the GLC premises should not occur unless prior approval is obtained from their parent and the Heads of School or other senior colleague with delegated authority.

16. Transporting Pupils

In certain situations, e.g. out of school activities, staff or volunteers may transport children – such arrangements are subject to strict policies and procedures.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior

manager and parents/carers.

17. Educational Visits and After-School Activities

Trips and Activities are subject to specific policies and procedures.

Adults should take particular care when supervising pupils on trips and outings, where the setting is less formal than the usual workplace. Adults remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries.

18. Photography and Videos

Working with pupils may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and wellbeing of pupils. Informed written consent from parents or carers and agreement, where possible, from the child or young person, should always be sought before an image is taken for any purpose.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken, especially if it is to be used for any publicity purposes or published in the media, or on the Internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

Adults need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.

It is not appropriate for adults to take photographs of children for their personal use.

It is recommended that when using a photograph, the following guidance should be followed:

- If the photograph is used, avoid naming the pupil;
- If the pupil is named, avoid using their photograph;
- Schools should establish whether the image will be retained for further use;
- Images should be securely stored and used only by those authorised to do so.

Appendix B - ICT Acceptable Use Policy

1. Introduction

ICT [including data] and the related technologies such as computers, email, the internet and mobile devices are an expected part of daily working life in school and the use of electronic communication and resources is encouraged.

All members of the school community are expected to use ICT responsibly and to comply with all applicable laws, policies and procedures, and with normal standards of professional and personal courtesy and conduct.

This policy is designed to ensure that all workers are aware of their professional responsibilities when using any form of ICT.

Failure to follow this policy may result in the withdrawal of access to school computers, email and internet and/or to disciplinary action, depending on the circumstances of the case.

Technology and the law change regularly and this policy will be updated as and when necessary. Workers will be informed when the policy has changed but it is their responsibility to read the latest version of this document.

2. Use of School Equipment/Networks

Computers, Mobile Phones and other devices provided by the school are loaned to individuals to support their professional responsibilities and must be used in accordance with this policy.

Workers are responsible for the safe and proper use, care and security of equipment and systems provided. Devices must be secured appropriately especially when leaving the school premises [i.e. not left unattended] and protected from unauthorised access or use [i.e. not accessed by family members]. Any loss, damage or unauthorised access must be reported immediately.

Workers must not use school equipment, networks or systems to access, download, send or receive, store, create, copy or distribute any material which may be malicious, illegal, libellous, immoral, dangerous or offensive [this includes but is not limited to pornographic, sexual, violent or criminal content and racist, sexist, or otherwise discriminatory material].

Appropriate and authorised electronic communication with pupils or former pupils must be through official school network, channels, systems and on school equipment.

2.1 Remote/virtual learning

The same standards of conduct and behaviour and proper application of all policies and procedures are expected in virtual interactions with pupils as are required in person. In addition to following the other provisions within this policy and all other school policies:

- Virtual connections should only be made where agreed and approved;
- An adult should be present with the pupil where engagement is one to one;
- Dress codes should be observed;
- Virtual interactions should be in a neutral space - avoid personal spaces such as bedrooms and be aware of what is in the background on the screen.

3. Use of Email

School business must always be conducted through official email addresses, which must be secured with password controls. Workers should respond to emails during working hours in a timely and appropriate fashion.

Email should be treated like any other form of written communication and, as such, the content should be

appropriate and accurate and data protection compliant.

Extreme care must be taken with attachments from third parties, particularly unidentified third parties, as these may contain viruses.

Email must not be used to receive, send or forward messages that are defamatory, obscene or otherwise inappropriate. If such an email is received, whether unwittingly or otherwise and from whatever source, this must not be forwarded to any other address and must be reported immediately.

Reasonable access and use of the internet/intranet and email facilities is available to recognised representatives of professional associations' i.e. union officers for the performance of their official duties and activities.

4. Social Networks

Social networking applications include but are not limited to:

- Blogs;
- Online discussion forums, for example Facebook;
- Media sharing services for example YouTube;
- Professional networking sites, for example Linked In;
- 'Micro-blogging' application for example Twitter.

Where the school operates official networking sites, these must be managed and used in accordance with this policy. This includes the following requirements:

- Use of official [i.e. not personal] email addresses for user accounts;
- Appropriate feedback and complaints information must be published in a prominent place which is easily accessible to other users;
- The school's logo and other branding elements should be used to indicate the school's support. The school's logo should not be used on social networking applications which are unrelated to or are not representative of the school's official position;
- Users should identify themselves as their official position held within the school on social networking applications e.g. through providing additional information on user profiles;
- Any contributions on any social networking application must be professional, uphold the reputation of the school and be in accordance with data protection requirements;
- Users must not promote or comment on personal matters [including personal/ financial matters], commercial ventures, political matters or campaigns, religion or other matters;

5. Personal use of school Equipment/Networks

School equipment, internet services, systems and email may be used for incidental personal purposes, with the approval of the line manager, provided that it:

- Does not interfere with the school's operation of computing facilities or email services;
- Does not interfere with the user's employment or performance of professional duties or other obligations to the school;
- Is of a reasonable duration and frequency;
- Is carried out in authorised break times or outside their normal working hours;
- Does not over burden the system or create any additional expense to the school;
- Is not used to access, send, receive or store inappropriate material; and
- Does not bring the school and its community into disrepute.

Workers must notify the school of any significant personal use.

Reasonable access and use of the internet/intranet and email facilities is available to recognised representatives of professional associations' i.e. union officers for the performance of their official duties and activities.

Email should be treated like any other form of written communication and, as such, the content should be appropriate and accurate and data protection compliant.

School equipment/networks/systems must additionally not be used for:

- Commercial purposes not under the auspices of the school;
- Personal financial gain;
- Personal use that is inconsistent of other school policies or guidelines; or
- Ordering of goods to be delivered to the school address or in the school's name.

6. Use of personal ICT equipment in school

6.1 Mobile Phones

It is accepted that individuals may bring personal mobile phones to school. Personal mobiles should have security codes to prevent access by other persons and must be stored securely and not accessible to pupils at any time.

Workers are not permitted to use their personal mobile phones to call, text, email or in any other way message pupils. Nor may they divulge their personal telephone number(s) or other contact details to pupils under any circumstances.

Workers are required to ensure mobile telephones are switched off/to silent during working hours and accessed only during authorised breaks. Any urgent phone calls or messages must be directed to the office who will notify workers immediately. Workers who need to use their mobile telephone to make or receive an urgent call during working hours should where possible obtain prior authorisation from their line manager to do so.

6.2 Other electronic devices

Workers should not bring other electronic devices [e.g. computer, tablet, smart watch etc] onto school premises unless this has been specifically authorised by an appropriate manager. In such circumstances, the equipment [must be kept securely [at the risk of the owner]] and security protected so that it cannot be accessed by pupils or others at the school.

Any personal use of such equipment must be restricted to an employee's break times or outside their normal working hours and must not impact on their duties in any way.

Additionally, specific permission must be obtained prior to connecting any device to school networks/systems and the device(s) must have adequate virus protection.

Workers must ensure that no personal information regarding school business, its pupils or staff is stored on such personal equipment.

Where exceptionally, specific permission is granted to use personal equipment for work purposes e.g. to give a presentation, the employee must be extremely vigilant that personal files/data etc. are not inadvertently accessed or displayed.

No pictures or videos may be taken within school or at any school related activity, on personal devices.

7. Personal social networks

The school recognises individual rights to privacy and a private life. However, the law generally views social media as in the public domain, irrespective of privacy settings. Workers are therefore advised to be mindful of their duties and obligations to uphold the reputation of the school, to comply with the Code of Conduct and other policies and contractual terms in their use of personal social media – being mindful of the real possibility for material to be posted, shared and made public inadvertently or by other contacts.

The school may require the removal of content it considers inappropriate.

It is totally unacceptable for any worker to discuss pupils, parents, work colleagues or any other member of the school community or any school related business on any type of social networking site.

Other posting on personal sites may also impact on the reputation of the school or the suitability/conduct of the

employee for example if an employee is off sick but makes comments on a site to the contrary, postings of indecent or inappropriate images/activities etc.

Workers must not accept or propose contact, nor engage in any conversation with pupils on any personal social networking sites. Workers should also avoid personal network contact with former pupils, particularly those under the age of 18 years.– any relevant contact with ex-pupils should be through school channels and agreed with school leaders.

Individuals working in the school should not use or access social networking sites of pupils.

8. Security

The school follows sound professional practices to secure data, system programmes, email records and networks under its control.

Workers must take all reasonable precautions to maintain security and confidentiality and to protect data. This includes:

- Using appropriate security measures such as encryption/password protection to transmit confidential or sensitive information;
- Ensuring all devices and system access are password protected Using secured memory sticks [all laptops, memory sticks and devices used must be encrypted];
- Ensuring that pupils are not exposed to any inappropriate images or web links; and
- Respecting all copyrights and not copy, retrieve, modify or forward copyrighted materials except as permitted by the copyright owner.

Users must not:

- Use, transfer or tamper with other people's accounts and files;
- Use anonymous mailing services to conceal identity when mailing through the Internet, falsify e-mails to make them appear to originate from someone else, or provide false information to any Internet service which requests name, e-mail address or other details;
- Use electronic media and services in a manner that is likely to cause network congestion or significantly hamper the ability of other people to access and use the system;
- Store sensitive or confidential data on their own equipment – this extends to personal cameras, mobile phones and other similar devices;
- Use the internet/intranet facilities or equipment to deliberately create any virus, worm, Trojan horse or any such other programme that is harmful to normal computer operations.
- Monitor or intercept the files or electronic communications of other workers or third parties;
- Hack or obtain access to systems or accounts they are not authorised to use;
- Use other people's log-ins or passwords; or
- Breach, test, or monitor computer or network security measures without authorisation.

Where any security breach or inappropriate connection or ICT activity occurs, the user must immediately disconnect/log out and report immediately.

9. Privacy and Monitoring

The school respects workers' privacy and will not routinely inspect or monitor emails, data or internet usage.

However, workers should not have any expectation of absolute privacy in his or her use of the school systems or equipment [including but not limited to networks/servers/internet usage/networks/Wi-Fi]. Under the following circumstances the school reserves the right, at its discretion, to review any electronic files and messages to the extent necessary to ensure systems are being used appropriately:

- When required by law;
- If there is a substantiated reason to believe that a breach of the law; or school's policy has taken place;
- If the school suspects that the employee has been viewing/transmitting offensive or illegal material;
- If the school suspects that the employee has been spending an excessive amount of time on activity which is not work related;
- Where required for compliance checks e.g. auditors, data protection; or
- Where there are emergency or compelling circumstances.

The school will endeavour to notify affected individuals of any monitoring which will take place and the reason for it, save in exceptional circumstances [see below].

Workers will normally be notified of what information will be recorded and retained, and for how long, who will have access and how such information will be used, which will include using such information for disciplinary purposes where applicable.

When monitoring emails, the school will, save in exceptional circumstances; confine itself to looking at the address and heading of the emails. Workers should mark any personal emails [where these are permitted by the school] as such and encourage those who send them to do the same. The school will avoid, where possible, opening emails clearly marked as private or personal.

The school considers the following to be valid reasons for checking an employee's email:

- If the employee is absent for any reason and communications must be checked for the smooth running of the school to continue;
- If the school suspects that the employee has been viewing or sending offensive or illegal material, such as material containing racist terminology or nudity [although the school understands that it is possible for workers inadvertently to receive such material and they will have the opportunity to explain if this is the case];
- If the school suspects that an employee has been using the email system to send and receive an excessive number of personal communications [or any personal emails if this is prohibited by the school];
- If the school suspects that the employee is sending or receiving emails that are detrimental to the school or its pupils.

The school may monitor communications without notification in certain specific circumstances, including but not limited to:

- Establish the existence of facts relevant to the school e.g. whether a contract was entered into by email;
- Ascertain compliance with regulatory or self-regulatory practices e.g. checking that the school is complying with external or internal regulations;
- Ascertain or demonstrate standards that are or ought to be achieved by workers using the system;
- Investigate or detect unauthorised use of the telecommunication system, which would include checking that workers are not breaching the school's policy on email and internet use; and
- Ensure the effective operation of the system, for example through virus monitoring.

Monitoring will be reasonable and in accordance with current legislation.

9.1 Covert monitoring

The use of covert monitoring will only be used in exceptional circumstances, for example, where the school suspects criminal activity or where telling the employee about the monitoring would make it difficult to prevent or detect such wrongdoing.

If the school considers covert monitoring to be justified, this will only take place as part of a specific investigation and will cease when the investigation has been completed.

Appendix C – Email Good Practice Guide

Good Practice	
Read receipt	When it is important to know that a recipient has opened a message, it is recommended that the sender invoke the 'read receipt' option.
Attachment formats	When attaching a file it will have a specific format. Be aware of the possibility that a recipient may not have the software necessary to read the attachment. Format incompatibility can occur even between successive versions of the same software, e.g. different versions of Microsoft Word.
E-mail address groups	If messages are regularly sent to the same group of people, the addressing process can be speeded up by the creation of a personal group in the personal address book.
Message header, or subject	Convey as much information as possible within the size limitation. This will help those who get a lot of emails to decide which are most important, or to spot one they are waiting for.
Subject	Avoid sending messages dealing with more than one subject. These are difficult to give a meaningful subject heading to, difficult for the recipient to forward on to others for action, and difficult to archive.
Recipients	Beware of sending messages to too many recipients at once. When sending messages for more than one-person's use be sure to indicate people for whom there is some expectation of action or who have central interest. cc to indicate those who have peripheral interest and who are not expected to take action or respond unless they wish to do so.
Replying	When replying to a message sent to more than one person, do not routinely reply to all recipients of the original message. Consider who needs to read your reply, e.g. if the sender is organising a meeting and asking you for availability dates, you need only reply to the sender.
Absent	If you have your own email address, it is possible, for users of MS Exchange or have local enhancements to MS-mail, to set the 'out of office' message when you are going to be away for some time, e.g. on annual leave. You won't lose your messages, they will await your return, but the sender will know that you're not there and can take alternative action if necessary.
Evidential record	Never forget that electronic conversations can produce an evidential record which is absent in a telephone conversation. Comments made by an employee during the course of an exchange of emails could be used in support, or in defence, of the school's legal position in the event of a dispute.
Legal records	Computer generated information can now be used in evidence in the courts. Conversations conducted over the email can result in legally binding contracts being put into place.
Distribution lists	Keep personal distribution lists up-to-date and ensure you remove individuals from lists that no longer apply to them
EMail threads	Include the previous message when making a reply. This is called a thread. Threads are a series of responses to an original message. It is best that a response to a message is continued by using reply accessed on the quick menu bar, rather than start an entirely new message for a response. Keep the thread information together. It is easier for the participants to follow the chain of information already exchanged. If the message gets too long the previous parts can be edited while still leaving the essence of the message.
Context	Email in the right context, care should be taken to use email where appropriate. There may be occasions when a telephone call would be more appropriate especially on delicate matters. Beware of the use of excessive use of capitals. It can be interpreted as shouting so consider how the style of your email may be interpreted by its recipient.
Forwarding e-mails	Consideration should be given when forwarding emails that it may contain information that you should consult with the originator before passing to someone else.
Large emails	For larger emails, particularly Internet emails, where possible send at the end of the day as they may cause queues to form and slow other people's e-mail.

Appendix D - Examples of unacceptable behaviour using social networking sites

1. Breach of contract

There is an implied term of mutual trust and confidence between employer and employee in all employment contracts. A very negative and damaging posting or communication on a social networking site about the GLC or colleagues may entitle the GLC to decide that this term has been broken. Such conduct would be subject to the GLC's disciplinary procedure and could warrant the employee's dismissal.

Emails are capable of forming contractual documents. Contracts can easily be formed by careless emails and non-compliance with the terms of any such contracts will render an organisation liable for a breach of contract claim. Emails tend not to be subject to the same safeguard procedures as paper documents which are often checked before they are signed off.

2. Defamation

If an employee places defamatory information or material on a social networking site such as bad mouthing another colleague or a pupil of the school, such conduct would be subject to the GLC's disciplinary procedure and could lead to the employee's dismissal.

3. Discrimination

The GLC's recruitment and selection policy provides the correct and proper procedures to be used in the recruitment and selection of staff. Candidates should be selected on the basis of testable evidence provided on application forms and through the selection process and references as provided by the applicant. Under no circumstances should information from social networking sites be used to make selection decisions. Such action could result in expensive discrimination claims. For example - not all candidates will have profiles on social networking sites and using information from this source may be seen as giving an unfair advantage or disadvantage to certain candidates, possibly discriminating against younger people who are likely to use social networking sites more often.

Many forms of discrimination claims, including harassment claims can occur via emails. If an employee places discriminatory material about another employee, a member of the Board of Directors, parents, children, young people, and vulnerable adults, this could amount to bullying or harassment of that individual.

The GLC may be vicariously liable for such acts unless it took such steps that were reasonably practicable to prevent material being placed on a site. Where an employee carries out an act of harassment or discrimination in the course of their employment, the GLC is vicariously liable for that act even when the act is unauthorised. Once an issue of email harassment has been raised and the harasser identified, immediate action should be taken to stop the harassment and instigate the disciplinary procedure while supporting the harassed employee.

4. Breach of health and safety

For example an internet video clip of employees performing stunts wearing the organisation's uniform. When information like this is found, the GLC should follow the company's disciplinary procedure to investigate the possibility of a breach of health and safety legislation on the part of the employee. If a school is aware of this and fails to investigate there may be liability for personal injuries in the law of negligence.

Appendix E
Professional style trainers



Non professional style trainers

