

# <u>Deptford Green</u> Staff Code of Conduct

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#### 1. Introduction

This code sets out clear guidance on the standards of professional conduct expected from all staff at Deptford Green School. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and to minimise the risk of inappropriate conduct occurring. This code seeks to safeguard the interests of all members of our school community. The reputation of the school also impacts on everyone associated with the school and is therefore something all of us will be keen to promote in our personal and professional capacities.

This code complements and supports the statutory/guidance frameworks provided by related documents and national professional codes in existence at any time.

School staff are in a unique position of trust and influence as role models for students. Therefore, staff must adhere to behaviour that sets a good example to all students within the school.

Staff also have an individual responsibility to maintain their reputation and the reputation of the school, both inside and outside working hours and work setting.

Deptford Green School requires all staff to have read and comply with this code as it applies to the role they undertake. If anyone is in any doubt as to how this code applies to them or their role, then they should seek clarification from their line manager or a member of the senior leadership team.

The code would apply to the following groups in various ways:

- All members of staff including teaching and support staff
- Volunteers, including governors
- Casual workers
- Music tutors
- Additional colleagues working in Inclusion such as Speech and Language Therapists
- Temporary and supply staff, either from agencies or engaged directly
- Student placements, including those undertaking initial teacher training and apprentices.

Breach of or failure to observe this code will result in action being taken under the school disciplinary procedures including, but not limited to, dismissal.

This code of conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this code staff are expected to exercise their professional judgement and act in the best interests of the students and the school.

#### 2. Professional Behaviour and Conduct

2.1 Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity.



Deptford Green School expects staff to treat each other, students, parents and the wider community with dignity and respect at all times.

- 2.2 Staff must act in accordance with their duty of care to students and ensure that the safety and welfare of students are accorded the highest priority.
- 2.3 Staff should show fairness in their treatment of children and not exhibit behaviours such as embarrassing or humiliating students, making inappropriate jokes at the expense of students, discriminating against or favouring students.
- 2.4 Staff must show tolerance of and respect the rights of others and should uphold the fundamental British values including democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs and those with none.
- 2.5 Staff must have regard for the ethos and values of the school. They must not do or say anything which may bring the school or governing body into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside school and responsibilities within school. Staff should act in accordance with the school's policies and procedures at all times.
- 2.6 Staff should adopt a positive 'can-do' attitude to stimulate a positive culture in the school. The use of praise is encouraged to reinforce good behaviours and staff should lead by example in terms of punctuality, quality and setting high standards.
- 2.7 Staff should endeavour to foster positive relationships with all members of the school community. The points below are indicative of behaviours which may promote the sorts of relationships we would wish to see in our school community and are not intended as a definitive solution to what is a very complex area.
- Demonstrating courtesy, politeness, tolerance, tact and good manners
- Avoiding angry confrontations, seeking to de-escalate situations where appropriate
- Respect parents, stakeholders and colleagues with differing views
- Be honest and remain objective
- Show appreciation for different skills and contributions within the school
- Seek to resolve issues promptly and appropriately through discussion
- Respect privacy and avoid gossip, supporting each other as appropriate
- 2.8 Staff should always sign in and out of the building (including if a staff member only leaves the building for a short time during the day). This is an essential health and safety measure.
- 2.9 Staff should complete an Application for Absence (AfA) form for any planned absence from school. This should usually be completed at least two weeks before any absence. Relevant documentation is found on The Green.
- 2.10 Any unscheduled absence, such as an absence as the result of illness, should be phoned in using the school's Coverline and before 7am on the day of the absence. All staff should be cognisant with the school's absence procedure.
- 2.11 Staff should model appropriate behaviours when moving around the building, including not communicating to staff on other floors over the balcony.



- 2.12 Staff must access and read the relevant Student Passports for any SEND students in their classes and plan lessons accordingly.
- 2.13 Staff should always avoid shouting at students and instead employ other agreed techniques and strategies, including using the Patrol system.
- 2.14 Staff should always be mindful of the language they use with students and the impact this can have. Descriptors such as *dumb* or *stupid* are not appropriate, even when describing a behaviour (i.e. 'your behaviour was stupid').
- 2.15 Getting a person's name right is really important, whether this is a student or a colleague. Using a person's 'agreed' and 'preferred' name is appropriate. Occasionally for various reasons a student's name might change. This is agreed with home and should be the name that staff then use moving forward.
- 2.16 As a general rule staff should refer to parents as Mr or Ms (surname) and should encourage parents to reciprocate this, not inviting parents to call them by their first name. This helps to maintain a professional distance.
- 2.17 Staff must ensure that they regularly check their emails for important school messages, they must always check the 'cover email' sent before 8am each day. Staff should be familiar with the School's Email Protocol.
- 2.18 Staff must ensure that they attend weekly briefing, in person or remotely and follow up with notes or recordings when they are absent from a briefing.
- 2.19 If for any reason a colleague is disqualified from the profession, they must inform school immediately.
- 2.20 If any colleague incurs a criminal offence, they are contractually obliged to inform the school immediately.

### 3. Safeguarding

- 3.1 All staff attend and engage with safeguarding training as part of their induction.
- 3.2 All staff engage at least annually with statutory safeguarding training.
- 3.3 All staff have access to the safeguarding policy, staff factsheets and other key safeguarding information. This can all be located in the 'all staff' team in Microsoft teams. Staff should make sure they familiarise themselves with these things.
- 3.4 Staff will familiarise themselves with our safeguarding policy and procedures and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child.
- 3.5 Staff have a duty to safeguard students from harm, and to report any concerns they have on CPOMS immediately. This includes physical, emotional and sexual abuse, and neglect.



### 4. Dress and Appearance

## **Dress Code**

## Creative Professional

Deptford Green is a vibrant and diverse inner city community school. It is a creative and innovative centre for learning.

- 4.1 All members of staff at Deptford Green must project an image of professionalism at all times and this includes the clothes we wear. No dress code could ever cover every eventuality and so members of staff will be required to follow this guidance and apply common sense and their own good professional judgment. Clothing should project a professional image and be appropriate for the subject that you teach/the area of the school you work in.
- 4.2 If you are in any doubt about a particular aspect of the dress code you should see your Line Manager for clarity.

#### 4.3 Acceptable dress includes:

Suits or trousers (dress trousers or smart trousers) and a blazer. An appropriate shoe. Jewellery should be kept to a minimum and should be appropriate. Smart knitwear. Skirts, dresses and a smart jacket. Collared shirts/blouses or tailored sweaters. Skirts and dresses should be an appropriate length.

## 4.4 Unacceptable dress includes:

Clothing that reveals too much of your back, your chest, your legs, your feet, your stomach or your underwear. In our work environment, clothing should be pressed and never wrinkled. Torn, dirty, or frayed clothing is unacceptable. Clothing must not feature any words, terms, or pictures including brand names and logos. Denim (trousers, skirts and jackets). Training shoes (except teachers of practical/physical subjects), sandals and flip flops. Un-tailored T-shirts. Strappy tops.

#### 5. Smoking, alcohol, e-cigarettes and other substances

- 5.1 Deptford Green School is a non-smoking site. Staff must not smoke or use e-cigarettes on school premises. Any member of staff wishing to smoke or use an e-cigarette must leave the school grounds but remain conscious of the effect this has on our neighbours.
- 5.2 Staff must not smoke or use an e-cigarette whilst working with or supervising pupils offsite.
- 5.3 Staff must refrain from excessive consumption of alcohol or use of illicit drugs or other illegal substances on or near school premises.



5.4 Staff must refrain from excessive consumption of alcohol and other substances at school/student events (i.e. Leaving Proms, residential visits) both within the school premises and outside the school setting.

### 6. Relationships with Pupils/Students

- 6.1 Staff must maintain professional boundaries with students appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.
- 6.2 Staff must not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person seeks to establish social contact, you should exercise your professional judgement in making a response and be aware that such social contact could be misconstrued. You should share this with your line manager as soon as possible.
- 6.3 Staff must not develop personal or sexual relationships with students and should not engage in any sexual activity with a student. Sexual activity does not just involve physical contact including penetrative and non-penetrative acts.
- 6.4 Working Together to Safeguard Children defines sexual abuse as ... 'forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Section 16 of The Sexual Offences Act 2003 provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) 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. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.
- 6.5 Staff should be mindful of section 16 of The Sexual Offences Act 2003.
- 6.6 Staff must not make sexual remarks to a student, discuss their own sexual relationships with, or in the presence of, students or discuss a student's sexual relationships in an inappropriate setting or context.
- 6.7 Contact with students should be through Deptford Green School's authorised mechanisms. Personal phone numbers, email addresses or communication routes via all social media platforms should not be used and staff should not share their home address with students. If contacted via an inappropriate route the member of staff must inform the Headteacher immediately.



- 6.8 Deptford Green School staff must not accept friend invitations or become friends with any student on any social media platform. Staff should also refrain from following the Twitter or other similar social media accounts of students or their parents. Staff must read the school's *ICT and Internet Acceptable Use Policy* carefully and follow all advice and guidance contained within it.
- 6.9 It is accepted that there may be exceptional circumstances such as a staff member also being a parent/relative of a student, or a pre-existing close family friend of the student's family. In these instances, staff should only accept friend invitations or become friends with any student of Deptford Green School on any social media platform, or follow them on Twitter or other similar social media accounts, or those of their parents, with the knowledge and express permission of the parent of the students in question.

#### 7. Infatuations

- 7.1 It is not unusual for students or, sometimes, their parents to develop infatuations towards members of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.
- 7.2 Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards yourself or another member of staff must be reported to your line manager.

## 8. Gifts/Hospitality

8.1 All staff should be aware that the acceptance of gifts and hospitality may compromise their professional position. If you accept any gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity ensure that your line manager is aware of this.

#### 9. Physical Contact with Students

- 9.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with students it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, culture and background.
- 9.2 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 which is acceptable to the child for the minimum time necessary.



- 9.3 It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore, use their professional judgement at all times.
- 9.4 Staff should be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Staff should never touch a child in a way which may be considered indecent. Always be prepared to explain actions and accept that all physical contact be open to scrutiny. Staff must not engage in rough play, tickling or fun fights with students.
- 9.5 Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact and staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.
- 9.6 Staff supervising PE and games or providing musical tuition should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However, they may be required to initiate physical contact with students to support a child to perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. Contact under these circumstances should be done with the student's agreement, for the minimum time necessary and in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student. Students should be made aware that where a staff member is concerned that there is an immediate risk of injury to the students which could be prevented by physical intervention, this will take place, potentially with no opportunity of warning the student in advance.
- 9.7 Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority.
- 9.8 If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to your line manager, recorded and, if appropriate, a copy placed on the child's file.
- 9.9 Staff should refer to Deptford Green School's Behaviour for Learning Policy, Health, Safety and Welfare Policy and the Child Protection and Safeguarding Policy.

#### 10. Child in Distress

- 10.1 There may be occasions when a student is in distress and in need of comfort as a reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- 10.2 Such incidents should always be recorded and shared with your line manager. If you have a particular concern about the need to provide this type of care and reassurance you should seek further advice from your line manager.



## 11. Showers and changing

- 11.1 Students are entitled to respect and privacy whilst they are changing or showering after PE or swimming. However, there needs to be an appropriate level of supervision in order to safeguard young people, meet health and safety requirements and to ensure that bullying does not take place. The supervision should be appropriate to the needs and age of the students and sensitive to the potential for embarrassment.
- 11.2 Staff should be vigilant about their own behaviour and announce their intention of entering a changing room. Staff must not change or shower in the same place as children.

#### 12. One to one situations

- 12.1 Staff working individually with students should be aware of the potential vulnerability of students and staff in such situations. Staff should manage these situations with regard to the safety of the student and to themselves.
- 12.2 Individual work with students should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant.

## 13. Transporting students

- 13.1 In certain circumstances it may be appropriate for staff to transport students offsite, for example sports fixtures, swimming lessons or other out of school activities. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and to respond to any difficulties that may arise.
- 13.2 Staff should ensure that the transport arrangements and the vehicle meet all legal requirements. Staff should ensure that the driver has the appropriate license for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.
- 13.3 Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency.
- 13.4 Staff should ensure that all passengers are seated at all times and wearing correctly fastened seatbelts.
- 13.5 On admission the parent/guardian signs a form indicating consent to the transporting of students offsite for the purposes of fieldwork, non-sporting activities related to the curriculum, and if selected to represent the school in a sporting activity. Details of school journeys further afield requiring transport, (including all residential trips), will be given to parents in a letter and separate consent forms will be issued. Staff should be aware that



the safety and welfare of the students is their responsibility until this is safely passed back to their parent/carer.

- 13.6 Staff should never transport students while under the influence of alcohol or drugs, or if they feel that their ability to drive safely is impaired for any reason.
- 13.7 Staff should not transport students in their own personal vehicle as this would usually not have the relevant insurances in place. In exceptional circumstances it might be necessary to transport a student in this way but it must be with the consent of the Designated Safeguarding Lead at the earliest opportunity and where possible beforehand, with the relevant safeguarding measures in place.

## 14. Online Safety

- 14.1 Staff should follow Deptford Green School's ICT and Internet Acceptable Use Policy.
- 14.2 Staff must not engage in inappropriate use of social network sites which may bring themselves, the school or the school community into disrepute. Staff should adopt the highest security settings on any personal profiles they have.
- 14.3 Staff should remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter students.
- 14.4 Staff must not make contact with students, must not accept or initiate friend requests nor follow student's accounts on any social media platform. Staff must not communicate with students via social media, websites, instant messenger accounts or text message. The only acceptable method of contact is via the use of school email accounts or telephone equipment. (Where there is a pre-existing relationship with a student please see 5.9)
- 14.5 Staff should not make contact with students' family members, accept or initiate friend requests or follow students' family member's account on any social media platform. (Where there is a pre-existing relationship with a pupil/student please see 5.9)
- 14.6 However, Deptford Green School acknowledges that staff who are also parents may wish to make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with students' family members via social media if that contact is likely to constitute a conflict of interest or call into question their objectivity. Staff who are not parents who are friends on social media with parents/guardians of students should be equally mindful of this eventuality.
- 14.7 Mobile phones and personally owned devices such as tablets should not be used during lessons. Mobile phones should be on silent mode at all times. Staff should be cognisant of the data protection laws around sharing school data.
- 14.8 The camera and filming functions of personal mobile devices must not be used in school, on school trips or on official school business.



14.9 Mobile phones and personally owned mobile devices brought into school are the responsibility of the device owner. Deptford Green School accepts no responsibility for the loss, theft or damage of personally owned mobile phones or mobile devices.

### 15. Photography, video and images of children

- 15.1 Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with The Data Protection Act 1998 the image of a student is personal data. Therefore, it is a requirement under the Act for consent to be obtained from the parent/guardian of a student for any images made. It is also important to take into account the wishes of the student, remembering that some students do not wish to have their photograph taken or be filmed. There is a list available from the Designated Safeguarding Lead that indicates where parents/guardians did not grant their consent on admission for images to be utilised in line with school policy.
- 15.2 Using images for publicity purposes will require the age-appropriate consent of the individual concerned and their parent/guardian. Images should not be displayed on websites, in publications or in a public place without their consent. Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.
- 15.3 Photographs/stills or video footage of students should only be taken using school equipment for purposes authorised by the school and should be stored securely and only on school equipment.
- 15.4 Staff should ensure that a member of the Senior Leadership Team is aware of the proposed use of photographic/video equipment and that this is recorded in lesson plans. All photographs/stills and video footage should be available for scrutiny and staff should be able to justify all images/video footage made.
- 15.5 Staff should remain aware of the potential for images of students to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken. Particular care should be given when filming or photographing young or vulnerable students who may be unable to question how or why the activities are taking place. Staff should also be mindful that students who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.
- 15.6 A student or parent might request the removal of a photograph from a publication or school display for personal reasons, including students who are Trans and have changed (or are changing) gender identity. This should be respected, and images removed immediately.

## 16. Confidentiality

16.1 Members of staff may have access to confidential information about students, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the student on a need to know basis.



- 16.2 Staff should never use confidential or personal information about a student or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the student.
- 16.3 Staff should not speculate or gossip about students, their families or their personal circumstances.
- 16.4 All staff are likely at some point to witness actions which need to be confidential. For example, where a student is bullied by another student, this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the student's parent or carer, nor with colleagues in the school except by a senior member of staff with the appropriate authority to deal with the matter.
- 16.5 Staff have a statutory obligation to share with Deptford Green School's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead any information which gives rise to concern about the welfare or safety of a student or that might suggest a student is in need or at risk of significant harm. Staff should pass on information without delay in accordance with Deptford Green School's Child Protection and Safeguarding policy and procedures and this should be recorded on CPOMS. Staff must never promise a student that they will not act on or pass on any information that they are told by the student. Also refer to section 3.
- 16.6 Staff should refer to the Department of Education's document Information sharing: advice for practitioners providing safeguarding services for further guidance on information sharing. If you are in any doubt about whether to share you should seek guidance from a member of the senior leadership team.
- 16.7 Any media or legal enquiries should be passed to the senior leadership team and only approved staff and Governors should communicate to the media about the school.

#### 17. Email Protocol

#### 17.1 Before sending emails consider:

- Would your message be better communicated face to face or over the phone?
- Is your message short, to the point and striking the right tone?
- Are the people you have copied in appropriate? Do you need to 'reply all'?
- Is your email professional?

#### 17.2 Emailing and work life balance:

- Set time aside at the beginning and the end of the school day to check and respond to emails.
- Organise your emails into folders and delete emails that you no longer need.
- Always have a subject for your email and make sure its clear (it will help when searching later on).
- At the beginning of the day check the cover email and for any tutor notices.
- Never send emails before 7am or after 7pm Monday to Thursday. Never send internal emails before 7am and after 5pm on Fridays. Never send emails on a weekend.



- Attempt to reply to emails within 48 hours. Responses should not be anticipated sooner than this.
- Always begin emails by addressing the recipient and end them with the formal school's signature.
- There are email groups arranged on Outlook, such as HODs, using these should save you time and avoid emails to whole staff.

#### 17.3 When to use other forms of communication:

- Always report Safeguarding incidents using the CPOMS system on The Green and not by email. Speak face to face with relevant members of the Safeguarding team, Heads of Year or members of the SLT before you leave the building.
- If the message is urgent, don't email it.
- Performance management, feedback from lessons and leverage targets should always be discussed face to face.
- Human Resources issues (such as salary, job descriptions, changes to timetabling and duties, career progression and individual CPD) should always be discussed face to face.
- Any message that requires dialogue is better in a meeting.
- Complex issues should be discussed in a meeting.
- Anything that the recipient might perceive as 'bad news' should be discussed in a face to face meeting.
- Venting frustrations is best done after a period of reflection and not over email.

#### 17.4 Sensitive information, security and the law:

- Always end emails with the formal school's signature (installed from your desktop).
- An email can be contractually binding (as binding as sending a signed letter).
  Therefore, care should be taken when expressing personal views that they cannot be misinterpreted as belonging to the School or the LA.
- Never use your work email address for personal matters.
- Never use your work email address when posting comments on public bulletin boards or chatrooms.
- Never participate in chain emails where you are asked to forward an email to a number of others.
- Never send emails that are offensive, threatening, defamatory or illegal. Emails can be used as evidence in libel cases.
- Be professional and careful about what you say to others; email is easily forwarded on. Only put in an email what you would be prepared to say to someone's face.
- Never copy parents of students into group emails.
- Our network is time sensitive and for security reasons your PC or laptop will lock itself after several moments of inactivity. However, staff are responsible for their computer and protecting the information that is on it.
- Staff who are absent from work for longer than a week might have their account opened by another member of staff.
- If you receive an email that is obviously spam, has a virus, or is adult in nature delete it immediately.



## 18. Whistleblowing

- 18.1 Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussion.
- 18.2 All school staff have a duty to report any behaviour by a colleague which raises concern. Staff should refer to Deptford Green School's Whistleblowing Policy for further guidance. This is particularly important where the welfare of students may be at risk.

## 19. Compliance

19.1 All staff must sign to confirm they have read, understood and agree to comply with this code of conduct.