EMPLOYEE CODE OF CONDUCT

ORGANISATION	SKAPE North East Ltd	POLICY REFERENCE	P15
UPDATED	12 November 2026	NEXT SCHEDULED REVIEW	12 November 2027
POLICY OWNER	Centre Manager	RELATED POLICIES	Safeguarding; Confidentiality; Whistleblowing; GDPR

01 INTRODUCTION

This document sets out SKAPE's Code of Conduct for its employees. The purpose of this code is to assist employees to achieve the required standards by setting out clearly what is required. The Employee Code of Conduct forms part of SKAPE's Staff Handbook when used in conjunction with:

- P05 Confidentiality Policy
- P12 Whistleblowing Policy
- P13 Complaints Policy

Also read this Code alongside the Safeguarding, Safer Recruitment, GDPR, Online Safety, Handheld Device and Mobile Phone, Equality and Diversity, Behaviour, No Bullying and Positive Handling policies.

1.1 The public are entitled to expect the highest standards of conduct from all our employees.

1.2 The aim of this Code is to:

- Make a clear statement about the standards of conduct expected of employees of SKAPE
- Ensure the highest standards of conduct by identifying SKAPE standards which sit alongside professional codes and guidelines;
- Help all employees to act in a way which upholds SKAPE standards and at the same time, protect them from criticism, misunderstanding or complaint; and
- To help build trust between SKAPE and the people who come into contact with those working for it.

1.3 SKAPE's values, as set out below, support this Code by providing further guidance in relation to how employees need to conduct themselves in the workplace.

- **Develop moral guidance**

We believe that a knowledge of and a strong personal belief in what is right and what is wrong brings meaning and direction to life.

- **Act with justice, respect and dignity**

We believe that every member of our diverse community is created equally and therefore we act with respect and show dignity, ensuring that all are treated with fairness, justice and equity. We work fervently to dispel inequality and pay special attention to those most in need.

- **Foster a sense of vocation**

We believe that all members of SKAPE should be supported to recognise their own purpose and to develop a sense of how they are called to contribute to society.

- **Promote educational excellence**

We believe that each person should be equipped to excel through the highest quality learning opportunities and richest wider Centre experiences.

- **Form high aspirations**

We believe that every member of our SKAPE community should have the highest expectations of themselves and others and should be equipped with the knowledge and skills to achieve greatly.

- **Celebrate community**

We believe that SKAPE promotes truth, honesty, reconciliation, resilience and integrity. Together, these values create strength, optimism and excellence across the Centre.

- **Support exceptional leadership**

We believe that the best leadership in SKAPE raises the work of the staff and the attainment of young people to levels that exceed expectations through consistent focus, effective management skills, profound empathy, sustained energy and robust optimism, underpinned by wide professional knowledge founded on innovative research.

1.4 In addition to the values, SKAPE has policies, procedures, and guidelines which should be read in conjunction with this Code.

02 SCOPE

2.1 This Code applies to SKAPE employees and volunteers. Agency staff, contractors and others working on SKAPE's behalf must also follow the professional and safeguarding standards relevant to their role. References to employees do not give volunteers or other non-employees employee status or automatically apply employee-only contractual terms to them.

2.2 Staff must read this Code, ask their manager about anything they do not understand and complete the acknowledgement in Appendix D. Employee breaches will be considered under the appropriate disciplinary or capability procedure and may result in formal action, up to dismissal where justified. Concerns about volunteers, agency staff or contractors will be addressed through the arrangements relevant to their role, including ending an engagement where appropriate. Necessary safeguarding action or referrals must still take place.

03 GENERAL PRINCIPLES

3.1 All employees of SKAPE are expected to give the highest possible standard of service to students, members of the public and fellow employees at all times.

3.2 The attitude of employees in dealing with people reflects on SKAPE, so it is important that they are helpful, polite and courteous. People's impression of SKAPE is strongly influenced by the views of the people who work for it. Whether or not employees are aware of it, others will accept the comments they make. Employees, therefore, need to consider carefully the effect of what they say.

3.3 Staff must raise concerns about wrongdoing, unsafe practice or breaches of SKAPE policy promptly through the appropriate reporting route. Safeguarding concerns follow the Safeguarding Policy; other public-interest concerns may be raised under the Whistleblowing Policy. Staff may use an appropriate lawful external route without first completing an internal procedure.

3.4 Staff must act professionally at work and at work-related events, including online. Conduct outside work may be relevant where it affects safeguarding, suitability for the role, professional responsibilities or SKAPE's legitimate interests. Any response must be fair and proportionate. Exercising lawful rights or raising a concern is not, in itself, misconduct.

04 THE PRINCIPLES

4.1 There are a number of principles that exemplify the required standards. They are set out below. A number of these aspects are dealt with in more detail within this Code.

Honesty, Integrity, Impartiality and Objectivity

All employees must perform their duties with honesty, integrity, impartiality and objectivity.

Accountability

All employees must be accountable to SKAPE for their actions.

Respect for Others

All employees must:

- Treat others with dignity and respect
- Not discriminate unlawfully against any person
- Treat others professionally

Stewardship

All employees must:

- Use any SKAPE funds in a responsible and lawful manner, and should refer to the appropriate SKAPE financial procedures and policies
- Not make personal use of property or facilities of SKAPE unless properly authorised to do so

Personal Interests

All employees must not in their official or personal capacity:

- Allow their personal interests to conflict with SKAPE's requirements
- Use their position improperly to confer an advantage or disadvantage on any person

Declaring Interests

All employees must comply with any of SKAPE's requirements:

- To declare interests
- To declare hospitality, benefits or gifts received as a consequence of their employment

Openness

All employees must not:

- Share confidential information without a lawful and necessary reason. Staff must follow the Confidentiality and GDPR policies. This does not prevent safeguarding reporting, a lawful protected disclosure, reporting a crime or obtaining legal or trade union advice.
- Prevent another person from gaining access to information which that person is entitled to by law

Duty of SKAPE

All employees must act in a way that upholds the trust that students, parents/carers and the public place in them.

Safeguarding

All employees must undertake their work in accordance with requirements laid down (for their job) in support of SKAPE's duties for safeguarding children and young people. All staff should adhere to and comply with SKAPE's policies and procedures for safeguarding.

05 CONFIDENTIALITY AND DISCLOSURE OF INFORMATION

5.1 SKAPE aims to be open and accountable while handling information responsibly. Staff must follow the Confidentiality and GDPR policies and share personal information only where necessary and lawful. If unsure, seek advice from the data protection lead or DSL as appropriate. This must not delay urgent safeguarding action or prevent a lawful protected disclosure.

5.2 Information obtained through work must not be used for personal or political gain, or passed to someone for that purpose. Confidentiality requirements do not prevent lawful whistleblowing, reporting a crime, obtaining legal or trade union advice, or other legally protected disclosures.

5.3 Staff must report actual or suspected data breaches immediately to the data protection lead. The DSL must also be informed where safeguarding information or a person's welfare may be affected.

5.4 Information provided in the course of work must be accurate and fair and must not be deliberately misleading. Records and disclosures must be managed under the relevant SKAPE policy.

06 WHISTLEBLOWING

SKAPE wants staff to raise genuine concerns about wrongdoing or unsafe practice. Staff do not have to prove that wrongdoing has occurred before reporting a concern. Follow the Whistleblowing Policy for public-interest concerns and the Safeguarding Policy for concerns about children or adults working with them.

Concerns can normally be raised with the Centre Manager. If the concern involves the Centre Manager or DSL, use an uninvolved Director or the appropriate external route. Staff may obtain independent legal or trade union advice and make a lawful disclosure to an appropriate external body without first exhausting SKAPE's internal procedure. Retaliation or unfair treatment for raising a concern or supporting another person is unacceptable. The Whistleblowing Policy explains the legal conditions for protected disclosures.

07 POLITICAL NEUTRALITY

Staff must carry out their work fairly and must not use their position to pressure students or colleagues to adopt their personal political views. Teaching and discussion must be appropriate to students' needs and present political issues fairly, in line with applicable requirements and SKAPE's curriculum arrangements.

Staff may hold and lawfully express personal views in their private lives. They must not present those views as SKAPE's position or breach safeguarding, confidentiality or equality responsibilities. This section does not restrict lawful whistleblowing or trade union activity.

08 RELATIONSHIPS AT WORK

8.1 Working relationships with colleagues, students and families must remain professional, respectful and appropriate.

8.2 Staff must maintain clear professional boundaries with all current students, including those aged 18 or over. Staff must not:

- enter a sexual or romantic relationship with a current student, engage in sexualised communication, groom a student or otherwise abuse a position of trust
- seek private personal contact or communication with students, including through personal social media or messaging accounts, outside the arrangements expressly permitted by the Handheld Device and Mobile Phone Policy
- show favouritism, use gifts or personal attention to create an inappropriate relationship, or exploit a student's vulnerability or trust
- use their position to exert improper influence or act unlawfully towards a student

8.3 Staff must declare any close personal or family relationship with a colleague that could affect impartiality or create a conflict. Share only the information needed to manage that conflict.

8.4 Pre-existing personal or family connections with students or their families must be discussed with the Centre Manager so that clear boundaries and any necessary arrangements can be agreed. Staff should seek advice promptly if a situation could be misunderstood and report concerns about their own or another adult's conduct through the safeguarding arrangements.

09 SAFEGUARDING OF STUDENTS

9.1 Safeguarding is everyone's responsibility. Staff must read Part One of Keeping Children Safe in Education 2026, understand SKAPE's Safeguarding Policy and complete the training relevant to their role. Staff must be alert to abuse, neglect and exploitation, including online harm, child-on-child abuse and sexual harassment. Concerns must not be dismissed as a joke or banter or assumed to be explained by a student's disability or additional needs.

9.2 Report concerns about a student immediately to the DSL or deputy DSL and follow the Safeguarding Policy's alternative reporting arrangements if neither is available. Make a factual record and do not promise absolute confidentiality. Call 999 where someone is in immediate danger; necessary referrals must not wait for an internal meeting or complaint process.

9.3 Concerns or allegations about an adult working with students, including low-level concerns, must be reported promptly to the Centre Manager under the appropriate safeguarding or allegations procedure. If the Centre Manager or DSL is involved, report to an uninvolved Director or the appropriate external safeguarding route. Staff must not investigate allegations themselves. The person managing the concern will follow local LADO arrangements where applicable and seek relevant external advice.

9.4 SKAPE will follow its own safeguarding arrangements alongside the commissioner's relevant procedures. The DSL or an appropriate uninvolved senior person will liaise with the commissioning school's DSL or local authority safeguarding contact where appropriate and safe. The commissioning school retains its overarching safeguarding responsibility, while SKAPE remains responsible for students in its care. Urgent protective action must not wait for the commissioner's response.

9.5 Staff must follow the Behaviour, No Bullying and Positive Handling policies. Physical contact must be appropriate to the situation and the student's needs. Restrictive intervention may only be used where lawful, necessary and proportionate, following the Positive Handling Policy, relevant training and reporting requirements. Force must never be used as punishment.

9.6 Staff must not routinely investigate a student's device or require them to display or forward harmful images. Follow the Handheld Device and Mobile Phone and Online Safety policies and report concerns to the DSL.

10 RECRUITMENT AND SELECTION AND OTHER EMPLOYMENT MATTERS

10.1 Recruitment and selection must follow SKAPE's Safer Recruitment Policy, relevant safeguarding requirements and fair recruitment procedures.

10.2 To avoid accusations of bias, employees must not be involved in recruitment and selection processes where they are related to or have a close personal relationship with an applicant.

10.3 Any relationship with a candidate that could create a conflict of interest must be declared privately to the Centre Manager or an uninvolved Director before taking part in the process. The relevant decisions must be handled by a suitably skilled, impartial person. Information about personal relationships must only be shared with those who need it to manage the conflict.

10.4 Employees should not be involved in other employment related decisions for employees who are a relative or with whom they have a close personal relationship, nor should they attempt to influence such decisions. This includes decisions on matters such as discipline, promotions or pay adjustments.

11 THE LOCAL COMMUNITY AND SERVICE USERS

Employees should always remember their responsibilities to the community and ensure courteous, impartial and efficient service delivery to all groups and individuals in that community in accordance with the policies of SKAPE. Employees should not be expected to place their personal health, safety and welfare at risk.

12 CONTRACTORS / SUPPLIERS / PROCUREMENT / TENDERING

Orders and contracts must be awarded in accordance with contracting procedures and rules and all relationships of a business or personal nature with external contractors or suppliers must be declared to the Centre Manager at the earliest opportunity.

13 OUTSIDE COMMITMENTS

13.1 SKAPE respects staff members' private lives. Outside commitments must be managed where they create a genuine conflict of interest, affect safe performance or interfere with contractual duties. A type of outside work, such as examination marking, does not automatically create a conflict.

13.2 Staff should discuss outside work or business interests that could create such a conflict with their manager, sharing only relevant information. Any restriction must be lawful, reasonable and based on the actual circumstances. The additional-work arrangements in section 16 also apply.

14 CONDUCT

14.1 Staff must behave in a way that supports students' safety and their suitability for the role. Concerns about conduct outside work will be assessed where there is a relevant link to safeguarding, professional responsibilities, safe performance or SKAPE's legitimate interests. Staff retain their rights to a private life, lawful expression and protected reporting.

14.2 All employees working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of parents/carers, the public in general and all those with whom they work.

15 DRESS AND APPEARANCE

15.1 Staff should dress in a way that is safe, practical and appropriate for their role and the activities they undertake. Clothing must allow staff to work safely with students and use any required protective equipment.

15.2 Clothing must not display discriminatory, abusive or sexually explicit material. Expectations will be applied fairly, with reasonable adjustments where required and appropriate consideration of disability, religion or belief and other protected characteristics.

15.3 Clothing does not excuse inappropriate behaviour by others. Any safeguarding concern or allegation must be taken seriously and handled through the proper procedure, regardless of what a person is wearing.

16 ADDITIONAL WORK

16.1 Staff may undertake additional work where it can be managed alongside their SKAPE role. They should tell their manager where the work could affect working hours, health and safety, contractual duties or create a conflict of interest.

16.2 SKAPE will not unreasonably restrict additional work and will respect legal protections for zero-hours and other eligible workers to take other jobs. Any request for information or proposed restriction must be lawful and proportionate.

16.3 Staff and managers must consider total working hours and rest, safe performance, conflicts of interest and the protection of confidential information. Follow the Working Time Regulations and any lawful arrangements that apply. The aim is to agree workable safeguards, rather than impose a blanket ban on other employment.

17 BOOKS, TRAINING MATERIALS AND INTELLECTUAL PROPERTY RIGHTS

17.1 Employees must obtain written permission before publishing work created for SKAPE or using SKAPE's confidential material or intellectual property. Privately created paid work outside normal duties is considered under the additional-work and conflict-of-interest arrangements. Copyright law and lawful disclosure rights must be respected.

17.2 SKAPE retains intellectual property rights for work undertaken by employees. Research, reports, designs, drawings, software and other developments or similar work, when created in the course of an employee's normal duties, remain the property of SKAPE. These should not be removed from SKAPE's premises or passed on to third parties by any employee acting in a private capacity without the express consent of their manager.

18 PATENTS AND INVENTIONS

18.1 Any matter, or object capable of being patented under the Patents Act 1977, made, developed or discovered by an employee, either alone or with others, whilst in the performance of their duties should be disclosed to SKAPE through the Centre Manager or their line manager. Subject to the provisions of the Patents Act, it will belong to and be the absolute property of SKAPE.

18.2 Employees must not undertake private or personal work, paid or unpaid, of any description in working hours or on SKAPE's premises unless their manager has given them specific permission.

19 INFORMATION TECHNOLOGY

19.1 SKAPE supports staff to use technology confidently and responsibly. Staff must follow the Online Safety, Handheld Device and Mobile Phone, GDPR and Confidentiality policies and relevant acceptable-use arrangements.

19.2 Use approved SKAPE systems and communication channels for work. Do not use personal accounts or devices for SKAPE information unless specifically authorised under the relevant policy. Staff must use authorised SKAPE-owned equipment for student photographs, video or audio, and follow consent, storage and sharing arrangements. Agreed medical and accessibility needs must be respected.

19.3 Report suspected misuse, security problems or harmful online activity promptly to the Centre Manager and to the DSL where safeguarding is involved. Report suspected personal data breaches immediately to the data protection lead. The Centre Manager coordinates specialist IT support where needed; the DSL leads the safeguarding response.

19.4 Staff will be told how and why SKAPE systems and devices may be monitored. Monitoring must be necessary, proportionate and handled under the GDPR and Online Safety policies, with access to records limited to those who need it. This Code does not assume that all activity is logged or that systems are monitored at all times.

19.5 Use AI only within approved SKAPE arrangements. Do not enter identifiable student, staff or confidential information into public or unapproved AI systems. Check accuracy, bias and suitability before using AI-generated material, retain professional judgement and report safeguarding concerns or harmful content through normal procedures.

20 SOCIAL MEDIA

20.1 Staff must follow applicable social-media arrangements alongside the Online Safety, Handheld Device and Mobile Phone, Confidentiality and GDPR policies.

20.2 Staff may use social media in a personal capacity but must maintain professional boundaries and must not present personal views as SKAPE's position. Staff must not:

- share confidential or personal information about students, families or colleagues without a lawful basis and appropriate authorisation
- post illegal, discriminatory, abusive or harassing material or use social media to bully or exploit others
- contact current students through personal accounts or publish student images outside approved SKAPE arrangements
- disclose protected intellectual property or knowingly misrepresent SKAPE or their authority to speak on its behalf

20.3 These expectations do not prevent lawful protected disclosures, reporting a crime, obtaining advice, trade union activity or lawful expression. Concerns will be assessed fairly in their context, with reference to the relevant SKAPE procedure.

21 PERSONAL INTERESTS

21.1 Staff must declare financial or non-financial interests that could conflict with their SKAPE role, using the interests declaration in Appendix D. Declarations must be kept up to date and shared only with those who need them to manage the conflict.

21.2 If employees are in any doubt about a potential conflict of interest, they should bring the matter to the attention of their manager so that a decision can be made as to how best to proceed.

21.3 Employees must not make, or become involved with, any official or professional decisions about matters in which they have a personal interest.

22 EQUALITY

22.1 Everyone has a right to fairness, dignity and respect. Staff must follow the Equality and Diversity and No Bullying policies. Discrimination, bullying, sexual harassment, victimisation and other harassment are unacceptable, including online. Staff must challenge or report harmful conduct through the appropriate procedure and support reasonable adjustments. A person must not be treated unfairly for raising a concern or supporting someone else's complaint.

23 TENDER PROCEDURES

23.1 Employees should exercise fairness and impartiality when dealing with all customers, contractors and subcontractors, and adhere to SKAPE's policies and procedures.

23.2 Employees responsible for engaging or supervising contractors and who have previously had, or currently have, a relationship in a private or domestic capacity with a particular contractor, must declare that relationship to the Centre Manager or line manager.

23.3 If employees become privy to confidential information on tenders or costs relating to external contractors, they must not disclose that information to any unauthorised person or organisation.

23.4 All employees must ensure that no special favour is shown to current, or recent former, employees or their partners, close relatives or associates in awarding contracts to businesses run by them or employing them in any capacity.

23.5 Employees must not buy items for personal use using SKAPE's contracts with external contractors.

24 GIFTS AND HOSPITALITY

24.1 Employees may from time to time, in the course of their work, encounter situations where individuals, including students, or organisations may offer gifts, money, awards, prizes, hospitality or other benefits.

24.2 Casual gifts offered to employees by contractors, organisations, firms, parents/carers or individuals such as calendars, diaries, pens, food, drink, flowers and other small gifts below (or perceived to be below) the value of £50 can be accepted.

24.3 Employees should notify their manager of any gifts with a value (or perceived value) of £50 and over. It is recognised that gifts are common custom and practice, particularly in schools at the end of the academic year and at Christmas, and that quite often gifts of a higher value may be received on behalf of a number of students within a class, which is considered acceptable practice.

24.4 When a gift needs to be refused, this should be done with tact and courtesy.

24.5 Employees who corruptly receive or give gifts, money, awards, prizes, hospitality or other benefits will face disciplinary action.

24.6 When giving gifts on behalf of SKAPE, employees should aim to ensure that the value of the gift is reasonable, is within the Scheme of Delegation of financial powers, the decision is fully documented and has due regard to propriety and regularity in the use of public funds.

24.7 Employees need to exercise discretion when accepting offers of hospitality particularly when the host is seeking to do business with SKAPE or who may stand to benefit in some way from dealing with SKAPE.

24.8 Offers of hospitality should only be accepted where there is a clear benefit to SKAPE in doing so e.g. networking, building contacts. If there is no or limited benefit, employees should not attend.

24.9 Hospitality offered by charitable or social organisations, usually in connection with an invitation to speak to the body, can be accepted. Employees should report to their manager any offer of hospitality before it is accepted.

24.10 A Gifts and Hospitality checklist is provided at Appendix A and a sample form to record any gifts and hospitality is provided at Appendix B.

25 CORRUPTION

25.1 Employees must be aware that bribing another person or receiving a bribe are serious criminal offences under the Bribery Act. Penalties include fines and / or imprisonment for up to 10 years.

25.2 The offence of 'bribing another person' will be committed if an employee offers, promises or gives financial or other advantage to another person with the aim of inducing or rewarding them to perform an activity or function improperly. The activity or function could relate to an external business or commercial activity or any public function (for instance done in house or by another public sector body).

25.3 For employees' own protection, if anyone makes an approach which seems to them, or might seem to a third party, to be aimed at obtaining some form of preferential treatment, or in any suspicious circumstances in connection with a contract, this should be reported to their manager.

26 FINANCIAL RESOURCES

26.1 Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner. Employees should always strive to ensure value for money.

26.2 To support employees involved in financial activities and transactions including budgetary control, operation of bank accounts, payments of accounts, payments of salaries and wages, petty cash and orders of works, goods or services SKAPE has developed financial rules and procedures.

27 SPONSORSHIP

27.1 Where an outside organisation wishes to sponsor a SKAPE activity or project, whether by invitation, tender, negotiation or voluntarily, the basic principles concerning the acceptance of gifts and hospitality apply. They should only be accepted where the hospitality involved is on a scale appropriate to the circumstances, reasonably incidental to the occasion and not extravagant.

28 CONTACT WITH THE PRESS AND MEDIA

28.1 Only authorised staff may speak to the press or media on behalf of SKAPE. Staff approached for an official comment should refer the enquiry to the Centre Manager or an appropriate uninvolved Director.

28.2 Staff speaking in a personal capacity must make that clear and protect confidential information and professional boundaries. They may lawfully express personal views. Authorisation to speak for SKAPE is separate from a person's right to make a protected disclosure, report a crime or obtain independent advice.

28.3 A trade union official or member commenting in that capacity should make their role clear. This Code does not prevent lawful trade union activity.

29 EXTERNAL TALKS AND PUBLICATIONS

29.1 Where an employee is invited to give a talk to an outside body, or participate in a broadcast, or contribute an article to a professional journal, or the like, on a matter related to their employment or on a personal interest which would be relevant to that employment, the following guidelines apply:

- Acceptance on SKAPE's behalf or during working hours requires agreement from the Centre Manager. Private activities outside work are considered under the additional-work and conflict-of-interest arrangements.
- Unless an employee is officially representing SKAPE, they should make it clear that they are speaking or contributing on a personal basis and that their views do not necessarily represent those of SKAPE
- Staff must protect confidential information and professional boundaries. This does not prevent lawful personal expression, protected reporting or obtaining advice.

29.2 Provided that an employee gives talks on relatively isolated occasions, they shall, at the discretion of their Centre Manager be permitted:

- To retain any fee received (on the assumption that any preparatory work will have been undertaken in the employee's own time), and
- To be absent for the purpose of giving the talk, interview etc., without the necessity of taking annual leave, if the invitation entails being absent during working hours, providing the absence from work is reasonable and does not adversely impact on the delivery of education / their work.

29.3 When an employee wishes to undertake paid lecturing on a regular basis additional to their employment with SKAPE, they should follow the same procedure as that specified for undertaking additional work.

30 SMOKING AND VAPING

30.1 It is the policy of SKAPE that our workplace buildings are smoke-free, and all employees have the right to work in a smoke-free environment. Smoking and vaping are prohibited in all enclosed areas and/or non-designated areas without exception. This includes common work areas, classrooms, conference and meeting rooms, rest areas, cafeteria areas and restrooms, SKAPE-owned or leased vehicles and all other enclosed facilities. Failure to adhere to this may result in disciplinary action being taken. Please see P26 Vaping Policy for further information.

31 DRUG AND ALCOHOL MISUSE

31.1 It is the responsibility of all employees to report to work fit for duty without impairment from alcohol and/or illegal drugs.

31.2 It is a disciplinary offence for employees to consume alcohol and/or use illegal drugs during working hours or whilst on duty.

31.3 Any employee representing SKAPE at official functions/meetings, whether within the working day or when attending evening seminars, meetings, etc. are reminded of the need to maintain appropriate standards of conduct at all times.

31.4 Where there is a belief that an employee is under the influence of alcohol and/or illegal drugs, the Centre Manager will ensure that the employee is escorted home safely and make arrangements to interview them on the next working day, or as soon as possible afterwards.

32 NOTIFICATION OF CRIMINAL INVESTIGATIONS AND OTHER REQUIRED DISCLOSURES

32.1 Staff must promptly disclose information that is relevant to their ability to perform their role safely or their suitability to work with students. Requests for criminal-record information must be lawful, relevant to the role and handled confidentially under the Safer Recruitment and GDPR policies.

32.2 Staff are not required to disclose convictions or cautions that are protected or filtered under the applicable rules. SKAPE will only ask for criminal-record information it is legally entitled to request for the particular role and check.

32.3 Staff must immediately inform the Centre Manager, or an uninvolved Director where appropriate, if they:

- are included on the Children's Barred List or become disqualified from relevant childcare where those rules apply
- are arrested, investigated, charged, summoned, convicted or cautioned in circumstances relevant to safeguarding, safe performance or suitability for their role, subject to the disclosure protections above
- become aware of another matter that could reasonably affect their suitability to work with students or their ability to perform the role safely
- are required to drive for work and receive a relevant driving conviction, disqualification or restriction that affects their ability to do so lawfully and safely

32.4 Information will be assessed fairly, taking advice where needed. A disclosure does not automatically establish wrongdoing or mean that a person is unsuitable for work.

32.5 The Centre Manager or an appropriate uninvolved person will assess risk and consider proportionate safeguards, which may include adjusted duties or temporary redeployment. Suspension with pay may be considered for an employee where justified, but is not an automatic response. Necessary safeguarding referrals must not be delayed.

32.6 Decisions and reasons will be recorded securely. Staff will be informed of relevant next steps and any employment action will follow the appropriate fair procedure.

33 MONITORING AND REVIEW

This Code is reviewed annually. The next scheduled review is shown at the start of this document.

34 DOCUMENT REVISION HISTORY

DATE	CHANGE	APPROVAL	REV.
11/08/2023	Initial policy	K. Watson	01
21/08/2024	Policy update	K. Watson	02
01/09/2025	Policy update	K. Watson	03
12/11/2026	SKAPE branding; safeguarding, professional boundaries, confidentiality, whistleblowing, digital conduct, employment expectations and required disclosures aligned with current guidance and related policies; appendices and staff declaration updated.	L. James	04

APPENDIX A GIFTS AND HOSPITALITY

Checklist for considering whether to accept a gift or hospitality

The question in all cases is one of judgement, and the following checklist of queries should help employees to decide whether a gift or an offer of hospitality should be accepted or declined.

(a) Is the value of the gift or hospitality £50 or over?

(b) If under £50 is it intended as an inducement?

(c) Is the extent of the hospitality, or nature of the gift reasonable and appropriate?

(d) Does the donor have any form of contractual relationship with SKAPE? Does it provide goods or services to SKAPE of any kind?

(e) Is the invitation/gift directed to a large group of unrelated individuals or open to the public, or has an individual been targeted because of their employment with SKAPE and the nature of their role?

(f) What is thought to be the motivation behind the invitation/gift?

(g) For hospitality, does the employee wish to attend if so why? Is it because there will be genuine benefits to SKAPE in terms of networking and contracts gained? Or is a desire to go centred around personal enjoyment?

(h) Would acceptance of the invitation be, in any way, inappropriate or place the employee under pressure in relation to any current or future matter involving SKAPE?

(i) For gifts, is there a difficulty in returning the gift? If it would cause offence can the gift be given to charity?

If an employee accepts a gift valued at £50 or more, they must declare it to the Centre Manager and record it in Appendix B. If they decline a gift valued at £50 or more, the Centre Manager should also be informed and the reason recorded. Gifts or hospitality intended to influence a decision improperly must be refused regardless of value.

APPENDIX B RECORD OF GIFTS AND HOSPITALITY

Date received	Details of gift or hospitality	Person receiving it	Given by name or company	Reason for gift or hospitality	Destination e.g. returned or used in raffle	Authorising signature

APPENDIX C CHILDCARE DISQUALIFICATION

Purpose and scope

The Childcare Act 2006 and the 2018 childcare disqualification regulations apply to specified childcare and its management. They are separate from the wider safeguarding and DBS requirements that apply to staff working with children.

The Centre Manager will check and record whether any SKAPE activities and staff roles fall within these rules, using current DfE and Ofsted guidance and taking specialist advice where needed. Relevant provision can include early-years childcare and certain later-years childcare for children under eight. The detailed definitions and exceptions must be checked against the actual activity and setting; age alone or a job title does not establish whether a person is covered.

Staff responsibilities

Staff undertaking a covered role must tell the Centre Manager promptly if they become aware of a relevant disqualification. Information will only be requested where relevant and legally permitted and will be handled under the Safer Recruitment and GDPR policies. Staff must not be required to provide protected criminal-record information that SKAPE is not entitled to request.

Where a person is disqualified from relevant childcare, they must not undertake that covered work unless an applicable Ofsted waiver has been granted. The Centre Manager will check the appropriate route and any restrictions before the work starts. Ofsted's waiver role does not make it a general appeal body for SKAPE complaints.

Review and guidance

Coverage must be reviewed when activities, age groups or roles change. Where childcare disqualification rules do not apply, SKAPE's other safeguarding, safer recruitment and DBS duties continue. Staff should seek clarification from the Centre Manager if unsure.

DfE Disqualification under the Childcare Act 2006: www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006

Ofsted Disqualification from childcare registration and how to apply for a waiver: www.gov.uk/government/publications/disqualification-from-childcare-registration-and-how-to-apply-for-a-waiver

DBS filtering guidance: www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide

Appendix C source history: first issued 10 July 2023; reviewed 1 September 2025. The current review is recorded in the main document revision history.

APPENDIX D STAFF ACKNOWLEDGEMENT AND INTERESTS DECLARATION

Complete this form after reading the Code. Ask about anything you do not understand. Record only relevant information; safeguarding concerns and criminal-record disclosures must use the appropriate separate reporting route.

Name

Role

Acknowledgement

- I have read the Employee Code of Conduct and know how to access the related policies.
- I understand the expectations relevant to my role and know how to raise a concern or ask for advice.
- I will keep relevant interests declarations up to date.

Questions or clarification needed

Interests declaration

Select one: [ ] No relevant interests to declare [ ] Relevant interests listed below

Relevant interest and possible connection with your SKAPE role

Staff signature and date

Manager review of interests declaration

Reviewer name and role

Agreed action or safeguards and review date

Reviewer signature and date

The reviewer must be uninvolved in any conflict. Keep the completed form securely with access limited to those who need it for their role.