CATS
GLOBAL SCHOOLS

Code of Conduct

Review Date: October 2026

Going further than others

Code of Conduct

All members of staff are expected to behave in a professional manner. This includes promoting the group values, leading by example, and consistently applying and upholding conduct.

It is expected that what constitutes professional behaviour in a school is obvious and common sense. Nonetheless, some example guidance is detailed below (though this list is not exhaustive):

- Staff are in position of trust with any student (regardless of age) and they must always be respectful of such relationships.
- Never make sexually suggestive comments to students in jest or fun, or engage in rough, physical or sexually provocative games, including horseplay.
- Never ask for personal information without providing an explanation of the reason for asking it and how the information is going to be used and stored and do not guarantee confidentiality and privacy.
- Never do things of a personal nature for a student that they can do for themselves.
- If a student approaches you inappropriately, discourage them and ensure you implement safe working practices such as: you are never alone with them, informing your line manager immediately or as soon as possible. In addition, make a written record of what has happened, including dates and times; what you said to the student; whom you spoke with after the event; and what advice you were given.
- If you find yourself in the position of working one-on-one always notify your line manager or another member of staff of the situation. If you must move location, then this also needs to be made known. Always leave the room door open and always make sure the student sits nearest the door. Where this is not possible, never obstruct the exit pathway of the student by placing yourself between the exit and the student.
- If you must speak to a student on a personal matter, it is always best practice to have another member of staff present. Where this is impossible, notify your immediate line manager prior to speaking to the student and where this is not feasible then as soon as you possibly can and remember to record notes about the interaction.
- Staff must be respectful of supervision of changing room areas.
- It is not appropriate for staff to socialise with students without the school being aware, and it is not appropriate for staff to use chat rooms or other online forums not set up by the school to communicate with students (E.g., Facebook and Instagram). Staff should always communicate within clearly defined boundaries.
  Staff should ensure that:

  - Personal social networking sites are set at private and never listed as approved contact.
  - Staff never use or access social networking sites of students.
  - Staff do not give their personal mobile details to students, including their mobile telephone number.
  - Staff only use official school mediums on their own devices to communicate with students (Teams, Outlook, Office 365, Canvas) Please refer to the Instant Messaging Policy and BYOD for more information. Staff should not post directly to school social media without prior approval from the Head and designated Marketing/Comms Staff.
  - Posts should only be made through official school accounts, set up and managed by the Central Marketing team, with designated school staff access, using school-issued email addresses.
  - Staff should never use personal accounts to post school content or to engage with students online.
  - Staff only contact students for professional reasons and in accordance with any school policy.
  - Staff do not use internet or web-based communication channels to send personal messages to a student.
  - Staff should not use personal mobiles to contact students at any time.

- Staff may not drive students in their own car unless they have business insurance and have logged all documents. Any student needing transportation must therefore be transported by our registered Taxi company whose drivers are all DBS checked.
- Staff must follow procedures when entering student areas in boarding houses, especially their personal spaces. Students must not access staff quarters or staff living areas unless instructed to do so in an emergency to call on a member of staff.
- Staff must read and understand the Anti-Bribery policy which explains the giving and receiving of gifts by students and staff.
- Staff must read and understand the Whistle-blowing policy.
- Staff must understand the importance of not sharing information with others about students or parents which they have gained confidentially.
- Always avoid using inappropriate or offensive language whilst in the presence of or students and colleagues.
- When in schools dress appropriately and in a professional manner.
- Do not demean or undermine students, their parents/carers/agents or colleagues.
- Always take reasonable care of any students under your supervision with the aim of ensuring their safety and welfare.
- Avoid putting yourself at risk of allegations of abuse or unprofessional conduct.

- Do not reveal any political leanings you may possess – remain impartial and balanced. Encourage considering and respecting all views and opinions within the sphere of British Values.
- Champion equality, diversity and inclusion and promote a non-judgemental approach. Always challenge behaviour that contravenes this.

It is not considered appropriate for staff to have contact with former students for at least two years after they have left the school. Staff may however contact students or former students at any time using school email for a legitimate reason.
In terms of physical contact with students, always consider whether behaviour is situationally appropriate - a hug initiated by the student at graduation in the presence of others would be viewed differently to a hug initiated by you alone in a classroom. Again, with any allegation a history of initiating contact is seen as an aggravating factor.

Concerns regarding a member of staff:

The message to all staff is this: if you are concerned about a member of staff, speak directly to the Headteacher/Principal/Rector or HR Team (or in their absence, the Chair of Governors) without informing the adult who is the subject of the concern. The Headteacher/Principal/Rector is available through Teams, email or in person and should be alerted to the fact that there is a concern regarding a member of staff. If your concern involves the Headteacher/Principal/Rector, speak to the Chair of Governors.

The Headteacher/Principal/Rector will determine whether the concern meets the threshold for an allegation. All allegations must be reported to the LADO immediately and within one working day in a serious case where a crime has been committed, the police must be informed. The headteacher may call the LADO for advice if it is unclear whether the threshold has been met or for general advice regarding the concern if deemed necessary. The headteacher will also likely seek counsel from the DSL in any case. For concerns that do not meet the threshold, the low-level concerns policy will be followed.

Staff include the DSL, supply staff, contractors and volunteers. For supply staff/contractors, the agency/employment business must be kept fully informed and involved, regardless of whether this is a serious concern or a low-level concern.

In cases of serious harm, the police will be informed from the outset.

General Workplace Code of Conduct

1. Purpose

This Code of Conduct sets the standard for professional behaviour and ethical practices within the workplace and at any time employees are representing the organisation outside of the company premises (ie. work social events, work related trips, while wearing work uniform.) It ensures a respectful, safe, and inclusive environment for all employees, contractors, and visitors.

2. Scope

Applies to all employees, contractors, and anyone representing the company in any capacity.

3. Core Principles

- **Integrity**: Act honestly and ethically in all workplace matters.
- **Respect**: Treat others with dignity, fairness, and courtesy.
- **Accountability**: Take responsibility for actions and decisions.
- **Confidentiality**: Protect sensitive information and respect privacy.
- **Compliance**: Follow all laws, regulations, and company policies.

4. Workplace Behaviour

- Always maintain a professional demeanour.
- Avoid discriminatory, harassing, or bullying behaviour.
- Foster a collaborative and inclusive work environment.
- Communicate openly and respectfully.
- Refrain from using offensive language or gestures.

5. Use of Company Resources

- Use company resources (e.g., email, internet, equipment) responsibly and primarily for work-related purposes.
- Do not engage in unauthorized use, theft, or misuse of company property.
- Company property may not be removed from site without express written permission from a member of the leadership team.

6. Conflict of Interest

- Disclose any personal, financial, or other interests that may conflict with company duties.
- Avoid situations where personal interests could interfere with professional judgment.

7. Reporting Violations

- Report any suspected violations of this Code to HR or a designated compliance officer.
- Failure to report may be managed under the Discipline & Conduct Policy.
- Retaliation against individuals who report concerns in good faith is strictly prohibited.

8. Consequences of Misconduct

- Violations may result in disciplinary action, up to and including termination of employment.
- Any misconduct relating to possession of illegal drugs will be reported to the police. Please see the CATS Alcohol & Drug Misuse Policy for more information.

Statement on Staff/Student Romantic or Sexual Relationships

All staff must maintain appropriate professional boundaries with students at all times. This includes both students under the age of 18 and students over the age of 18. The power imbalance inherent in staff-student relationships means that any romantic, sexual, or intimate relationship between a staff member and a student is strictly prohibited, regardless of the student's age or consent. Annex B contains examples of actions constituting a Romantic or Sexual Relationship that are prohibited.

This policy applies to all staff (academic, administrative, support, part-time, full-time, contract, and volunteer) and all students enrolled at the institution, whether they are under or over the age of 18.

The prohibition exists to:

- Safeguard students from potential abuse of power, manipulation, harassment, sexual misconduct or coercion.
- Maintain professional integrity and trust within the educational environment.
- Prevent conflicts of interest and protect the institution’s reputation.

Breaches of this policy will be treated as serious misconduct and may result in disciplinary action, up to and including dismissal.

Annex A: Low-level concerns policy

Principles

The Schools are committed to ensuring Low-Level Concerns are monitored, recorded and dealt with appropriately to create a safer culture for all staff, students and visitors. CATS Global Schools have a moral, legal, and social responsibility to provide a safe environment for students studying and residing with us.

Scope and References

This policy sets out good practice and provides guidance on how to deal with situations and put in safeguards where a low-level concern may be encountered to ensure promotion of a safe culture and the prevention of possible harm. It will work in conjunction with all school policies and procedures, including, but not exclusive to, the following: Safeguarding Policy, GDPR, Health and Safety, Prevent Strategy and Safer Recruitment Policy.

Distinction between an allegation and a Low-Level Concern

A culture encouraging the reporting of Low-Level Concerns enables staff to share any concerns they may have, no matter how small, about the behaviour of any adult in the school.

Concerns should not be limited to Safeguarding but could relate to behaviour which does not meet the professional standards expected within CGS.

The term 'allegation' means that it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon; have, as a parent or carer, become subject to child protection procedures; are closely associated with someone in their personal lives (e.g. partner, member of the family or other household

member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

A Low-Level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to the LADO.

A Low-Level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which is not consistent with an organisation's Code of Conduct, and/or relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Principal.

Importance of sharing Low-Level Concerns

It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at protective adults, not just children or vulnerable adults. This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. It is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.

To minimise the risk of situational offending, there needs to be a culture of allowing the confidence to speak out. This requires a robust framework, policy, training, support and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.

Self-Reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct.

Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest

opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

In line with KCSIE, the Schools will ensure that there is an environment where staff are encouraged and feel confident to self-refer.

Implementation

- To be effective, this policy must have 'buy in' from all staff, and leaders must be seen to adhere to and model the expected values and behaviours as written in the policy.
- Training on this policy will be incorporated in both the Safeguarding Induction Training for new staff and the Annual Safeguarding Training for all staff. Staff should contact the Principal, or in their absence the Chair of Governors, without informing the adult who is the subject of the reporting individual's concern.
- If the concern is about the Principal, it should be passed to the Chair of Governors without informing the Principal.
- In all cases, the initial contact should be followed up by e-mail where the concern was not conveyed in writing in the first instance.
- When a low-level concern has been raised by a third party, the Principal should collect as much evidence as is possible by speaking with the person who raised the concern, lo the individual and to any witnesses.
- Any concerns or issues relating to the Low-Level Concern Policy will be included in the annual safeguarding report to governors.

Data Protection

The Data Protection Act 2018 makes specific provision for the processing of personal data necessary for safeguarding children from harm. The Information Sharing Code of Practice (Information Commissioner's Office 2019) specifically cites safeguarding of children as a 'clear example of a compelling reason' to share personal data. Where a concern is low-level, rather than an allegation, the balance between safeguarding interest and personal data rights will be considered carefully to ensure it is a reasonably necessary measure that the data should be shared.

How Low-Level Concerns will be recorded

Low Level Concern Forms and records will be retained (including those subsequently deemed to relate to behaviour which is entirely consistent with the Code of Conduct) in the school folder and log in the central HR area on SharePoint. Where there are multiple low-level concerns relating to the same individual these will be kept in chronological order as a running record. These records will be kept confidential and held securely with only the Principal, HR team having access. The log will contain

details of the concern, the context in which it arose, and action taken. The name of the person reporting should be noted respecting wishes to remain anonymous as far as reasonably possible.

Where concerns also involve issues of misconduct or where such issues have caused the poor performance; disciplinary, grievance or whistleblowing procedures to be triggered, the normal records required would still be made and kept according to procedure in addition to the low-level concerns records.

Where the low-level concern is serious enough to be referred to the LADO (or in the case of Local arrangements requiring all concerns to be reported to the LADO), the related records will be placed and retained on the staff member's employee file. Where a low-level concern is reclassified as an allegation, then the records relating to it will be treated accordingly.

Review of the central Low-Level Concerns file

The Safeguarding Governor will review the school Low Level Concerns File termly. A record of these reviews will be made. This is to ensure such concerns are being dealt with promptly and appropriately and that any potential patterns of concerning, problematic or inappropriate behaviour are identified, a course of action can be decided and carried out. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. It will also be considered whether there are any wider cultural issues in school that enabled the behaviour to occur. If appropriate policies would be revised or extra training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken will be recorded.

Retention of Low-Level Concern records

There is currently no guidance on the retention of Low-Level Concerns, but the point at which an employee leaves the organisation would be considered a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Should Low-Level Concerns be referred to in a reference?

With reference to KCSIE guidance, allegations which are proven to be false, unsubstantiated or malicious, should not be included in employer references. Likewise, a history of repeated concerns which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. Misconduct or consistent poor performance, where relevant, may be included. This would not normally include Low-Level concerns of a safeguarding nature, unless the threshold is met for referral and found to be substantiated, where it should then be referred to in a reference. Where KCSIE does not apply, consideration must be given to legal obligations and duty of care in giving accurate references.

Role of the Board

The DSL's will include in the Quarterly Reports to the Board, the information about the implementation of the Low-Level Concern Policy and any evidence as to its effectiveness, with any relevant data.

Annex B: Examples of Actions Constituting a Romantic or Sexual Relationship (Prohibited)

The following is a non-exhaustive but comprehensive list of behaviours that may constitute a romantic, sexual, or intimate relationship between a staff member and a student, and are therefore prohibited:

Verbal/Emotional Behaviour

- Flirting or making suggestive comments to a student.
- Expressing romantic or sexual interest in a student.
- Initiating or engaging in emotionally intimate conversations unrelated to academic or professional matters (e.g., confiding in a student in a way typically reserved for personal relationships).
- Telling a student you have romantic feelings or desire to pursue a relationship.

Physical Conduct

- Touching a student in a way that goes beyond professional requirements (e.g., unnecessary physical contact, hugging, stroking hair, brushing against them intentionally).
- Kissing or attempting to kiss a student.
- Engaging in any form of sexual activity with a student.
- Meeting privately in off-campus locations for non-academic purposes.

Digital/Online Behaviour

- Sending romantic, sexual, or flirtatious messages via text, email, social media, or messaging apps.
- Accessing, following or messaging students from personal social media accounts for non-professional reasons.
- Using social media to engage in private, personal conversations with students.
- Sharing or requesting personal photos of a romantic or sexual nature.

- Liking, commenting on, or reacting to a student's online posts in a way that could be interpreted as flirtatious or suggestive.

Boundary-Crossing Behaviours

- Spending one-on-one time with a student outside of scheduled academic or professional duties (e.g., having drinks, dinners, or socialising informally).
- Offering gifts, favours, or special treatment that could suggest romantic intent.
- Inviting a student to your home or visiting the student's home.
- Meeting privately in off-campus locations for non-academic purposes. If there is a requirement to meet off-site for academic purposes, please seek permission from your line manager first
- Offering transport in a personal vehicle for non-essential, non-emergency reasons.
- Discussing or hinting at a desire to begin a relationship once the student has graduated or left the institution (i.e., "waiting until it's allowed").

Clarification

Even if the student is over 18, and even if the relationship is "consensual," it is not appropriate, ethical, or permitted. The staff-student power imbalance remains, and the risk to safeguarding, reputation, and fairness persists.

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