



Staff Code of Conduct Policy

How do we ensure the safety and well-being of our pupils and teachers at school? Measures related to staff conduct.

5th Revision: August 2025

1.- OBJECTIVE OF THE CODE OF CONDUCT

A code of conduct is a "set of principles or rules that define how you expect your employees to behave" (Harvard Business Review, 2019).

A code of conduct should always reflect the values of an organisation. The IA/ISP code of conduct is based on our purpose and our principles. Each of us is expected to follow and exemplify ISP's purpose and principles, as they encapsulate our approach to work, the spirit of our interactions with others, and the way we connect with others in the performance of our duties — students, parents, colleagues, suppliers, parents of prospective students, etc.

We expect our colleagues to act at all times in accordance with the highest standards of conduct and behaviour. IA/ISP employees are diligent, honest and ethical in the performance of their duties, and they devote their full time, attention and abilities to their work. They are polite, friendly and professional. They cooperate and collaborate with others in an effective and respectful manner. Compliance with reasonable instructions, the terms of employment contracts and ISP policies, as well as all relevant regulatory, professional and legal requirements, is taken for granted.

2.- OUR PRINCIPLES

They emphasise and underpin the way we do what we do.

We:

- **Start with our children and students:** Our children and students are the reason our company exists. Simply put, their success is our success.
- **Treat everyone with kindness and respect:** We look out for one another, embrace similarities and differences, and promote the well-being of others.
- **We work effectively:** We focus tenaciously on what matters most and will make the biggest difference.
- **We are financially responsible:** We make financial decisions with caution, based on the needs of children, students and our schools.
- **We learn continuously:** Improvement is what drives us.

CORE BEHAVIOURS:

ORGANISED - KIND - FLEXIBLE - EAGER TO EXCEL

3.- GOOD PRACTICES INCLUDE.

Well-being and safety

The health, safety and wellbeing of all our employees and students are our top priority. To this end, we pay as much attention to our mental health and general wellbeing as we do to our physical safety and wellbeing.

Each of us plays a role in ensuring that OUR school is a welcoming, safe and inspiring place where everyone can grow and develop. In this regard, our employees are expected to be responsible for their own wellbeing and that of those around them. This requires a commitment to:

- o Treating all students with respect.
- o Setting a good example by behaving appropriately.
- o Involving students in decisions that affect them.
- o Encouraging positive, respectful and safe behaviour among students.
- o Being a good listener.
- o Being alert to changes in pupils' behaviour and signs of abuse, neglect and exploitation.
- o Recognise that challenging behaviour can be an indicator of abuse.
- o Read and understand the intimate care policy, staff behaviour policy and guidance documents on wider safeguarding issues.
- o Be aware that the personal and family circumstances and lifestyle of some pupils carry a higher risk of abuse.
- o Refer all concerns about a pupil's safety and wellbeing to the DSL or, if necessary, directly to the police or social services.
- o Never use the toilets intended for pupils. Do not enter the PE changing rooms when pupils are changing, unless you suspect that a conflict is taking place between pupils.
- o Prohibit provocative games or those that may have sexual connotations.
- o Do not use language, attitudes or behaviour that could lead to an inappropriate relationship or that a minor could interpret as such.
- o If you are alone with a student, always do so with the door to the room open and in a place that is easily visible and accessible.
- o In the event of a fight between two students, use the minimum force necessary to separate the students in conflict and restore the situation to normal.
- o On school trips lasting more than one day, never share a room with students and prevent them from entering your room. On those exceptional occasions when the student's safety may be compromised, the protection of the student must take precedence over their privacy, after informing the student's legal guardians of the situation.
- o Do not share social media accounts, email addresses or personal telephone numbers with students. Communication with families and students will be through the platforms established by the school.

In general, all school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be irreproachable.

Staff understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18 when that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of school staff and a pupil under the age of 18 may be an offence.

On drug and alcohol abuse

IA/ISP has a duty to protect the health, safety and welfare of all its employees. However, we also recognise that, for various reasons, people may develop problems related to alcohol and drugs. With regard to drugs, these rules apply to substances that are illegal under criminal law, as opposed to prescribed medication. IA and ISP support prescribed medication, and employees should follow the specific advice of their doctors.

Even a small amount of alcohol can affect work performance. An employee working under the influence of alcohol will have repercussions: from substandard performance to serious health and safety consequences for themselves and those around them. The same applies when under the influence of drugs. Employees are expected to be able to perform their duties, obligations and responsibilities fully and safely, without any limitations.

If an employee comes to work under the influence of alcohol or drugs and their performance or health and safety (or that of their colleagues) is at risk, they will be subject to disciplinary proceedings. This is because incapacity or misconduct caused by excessive alcohol or drug consumption at work is a possible serious offence under the relevant disciplinary procedure. Furthermore, in such circumstances, we reserve the right to have the employee escorted off the premises immediately and sent home.

Illegal, non-prescription drugs may not be brought onto or consumed on the premises. If an employee is suspected of possessing or consuming drugs on the premises, or of buying or selling drugs, this will be investigated in accordance with the relevant disciplinary procedure.

Employees representing IA in client activities or business conferences, or attending social events organised by IA (both during and outside working hours), are expected to moderate their alcohol consumption and take specific and preventive measures to ensure that they are within legal limits if they are required to drive. The consumption of illegal, non-prescription drugs is expressly prohibited on these occasions, as well as at all other times.

Social drinking after working hours and outside IA premises is obviously a personal matter that does not directly concern our organisation. Concerns will arise when, due to the amount of alcohol involved, employees' attendance, performance or conduct deteriorates or their well-being is jeopardised.

Employees must inform their line manager or the Human Resources department of any prescribed medication that may affect their work performance and must follow any instructions given to them thereafter.

If a line manager believes that an employee's impaired performance or behavioural changes may be due to alcohol or drug use, they should seek advice from Human Resources. Confidentiality will be maintained as appropriate, but in order to support employees, it may be necessary to share a certain level of information.

We recognise that a problem with alcohol or drugs can be an illness that needs treatment, just like any other. We want to help protect employees from the dangers of alcohol, drug and other substance abuse, and encourage those with a problem to seek help. We will consider what support we can provide and, where appropriate, we will consider suspending any disciplinary action if drug, alcohol or substance use is a factor, provided that employees agree to and follow a procedure or treatment.

Employees should not attempt to cover up for a colleague whose work is being affected by a problem with alcohol or drugs.

In accordance with local legislation, our regions and colleges reserve the right to conduct searches for alcohol or drugs on regional or school premises, including searches of lockers, filing cabinets, desks, bags, clothing or packages. Any alcohol or drugs found as a result of searches will be confiscated and disciplinary action will be taken.

Failure to comply with these provisions constitutes a disciplinary offence and will be dealt with in accordance with ISP's disciplinary procedure. Depending on the seriousness of the offence, it may amount to gross misconduct and could result in the immediate dismissal of the employee.

Personal relationships

From time to time, relationships may exist or arise between employees. We recognise that personal relationships may arise at any time during a person's employment, or may exist before they join the organisation.

All employees, regardless of their level or position, must ensure that their conduct is appropriate at all times. Personal relationships at work are not generally prohibited. However, they must be managed with care and sensitivity, both for the employees in the relationship and for their colleagues. Any situation that arises must be treated fairly and consistently and managed correctly to mitigate potential allegations of abuse of authority, bias, impropriety or conflict of interest.

Employees are required to inform ISP of any relationships between themselves and other employees that may give rise to an actual or perceived conflict of interest, trust or breach of confidentiality. Some of these relationships include:

1. Close friendship, beyond a normal working relationship;
2. Intimate relationship.
3. Family relationship.

Employees may report to their line manager (who will then speak confidentially with Human Resources) or directly to the Human Resources department.

directly. If there are any doubts or questions, employees are advised to report confidentially and seek advice from Human Resources as soon as possible.

The Human Resources department will then confidentially analyse the relationship, including safeguarding practices, consult with the relevant members of IA's senior leadership team (SLT) and inform employees if a conflict of interest is deemed to exist. If this conclusion is reached, the HEAD will be informed confidentially and a decision will be made on any changes that need to be made.

As a matter of principle, members of the same family will not be employed at a school without the express consent of the HEAD. Similarly, members of the same family will not be employed at ISP's central office without the express consent of the HEAD.

Hierarchical relationships cannot continue when an intimate personal relationship exists or develops between employees in a reporting line, regardless of whether the hierarchy is direct or through others. This includes direct management decisions as well as additional input or influence, for example, in recruitment, selection, promotion or any other activity where a conflict of interest may arise. We will endeavour to resolve any such conflicts by reviewing direct reporting arrangements, team structure or responsibilities, where possible.

In addition, employees who have a personal relationship should not work together in other circumstances where a conflict of interest, breach of confidentiality or unfair advantage may be perceived due to the overlap of a personal and professional relationship.

If any of the personal relationships defined by this policy exist or arise and are not reported, it will be considered a serious matter that may result in disciplinary action depending on the circumstances.

Employees who feel affected by a close personal relationship at work involving other employees may contact Human Resources or their line manager at any time, without prejudice.

Relationships with suppliers, consultants and self-employed workers

In tendering processes, no special treatment should be given to companies run by friends, partners or family members, for example.

Employees who hire or supervise suppliers, consultants or self-employed persons, or have any other working relationship with these parties and have previously had (or currently have) a close personal relationship with someone who works for them, must report this relationship to their line managers, who in turn will report it to the Group CFO or the CFO of the relevant division.

Employees should refer to our Purchasing Policy for guidance and additional information.

Conducting our business honestly and ethically is part of our policy. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Our Anti-Bribery Policy applies to all individuals working for us or on our behalf in any capacity, including employees at all levels, directors, officers, temporary workers, volunteers, interns, agents, contractors, seconded workers, external consultants, third-party representatives and business partners.

Discrimination, retaliation, intimidation and harassment

Discrimination is treating someone unfairly because of who they are or because they have certain characteristics:

- age
- physical and mental disability
- illness or genetic information
- nationality/national origin and citizenship
- ethnicity
- race
- religion/beliefs
- sexual orientation
- marriage and civil partnership
- pregnancy



- gender/gender identity and gender reassignment
- veteran status
- part-time workers, temporary contract workers and temporary agency workers.
- trade union members

Bullying and harassment is any unwanted behaviour that makes a person feel intimidated, degraded, humiliated or offended. It is not always obvious or evident to others and can occur in the workplace without the employer being aware of it. Bullying or harassment can occur between two people or involve a group of people. It can be obvious or insidious. It can be persistent or an isolated incident. It can also occur in writing, by telephone, via email, not just face to face.

Retaliation generally refers to mistreatment directed at someone who has filed (or is believed to have filed or supported) a complaint or grievance. It includes situations where a complaint has not yet been filed, but retaliation is taken against someone because they are suspected of doing so.

Together, we are committed to creating and nurturing a safe, welcoming, inclusive, equitable and diverse community that represents and accommodates different cultures and groups, and in which each of us has the opportunity to thrive, contribute and do what we do best.

To sustain this commitment, there must be a culture of mutual respect and consideration. We all have a responsibility to embrace, support and grow this culture, and to challenge behaviours and attitudes that prevent us from achieving our goal. IA will not tolerate discrimination, harassment, intimidation or retaliation. If any employee feels they are experiencing such behaviour, they should report it immediately to their line manager or the Human Resources department.

Performance development

Supporting and encouraging personal development, learning and growth is essential to increasing motivation, commitment and engagement. It also helps to ensure that our staff know how to increase their contribution to the success of the team or the school.

At our school, *feedback* and respectful, professional dialogue are valued as a shared commitment to improving together. We therefore encourage individual or appraisal meetings between employees and their line managers. These meetings should focus on the objectives or outcomes that will most benefit our schools and regions, on the quality of learning, and on the personal learning, growth and development of employees.

Line managers and employees are also encouraged to hold personal development meetings. These allow managers and employees to step away from their day-to-day tasks to focus and talk about their learning, growth and personal and professional development.

Line managers and employees can learn more about our approach to performance development in our Performance Development Procedure and our Teacher Self-Assessment Procedure. At the local level, Human Resources plays an important role in supporting these procedures, as well as advising and guiding our line managers.

Secondary employment policy

Employees are asked to carefully consider the impact that any secondary employment may have on their ability to effectively perform their duties and responsibilities with the centre or whether it may create any potential conflict of interest with IA/ISP. Secondary employment should not be undertaken without the express permission of the company.

If not disclosed during the recruitment process, employees must inform their managers of any potential secondary employment before accepting it. Should any conflict of interest arise from such employment, their managers will discuss this with them directly and seek advice from Human Resources where appropriate.

Employees must not engage in any secondary employment while on company premises or during their contractual working hours. This includes answering phone calls or responding to emails related to the other employment.

Any other circumstances that could lead to a conflict of interest or a possible breach of confidentiality, industrial property or company inventions should also be referred to the employees' managers. Potential conflicts may include, but are not limited to, participating in a media interview, writing a blog post, developing and disseminating a learning theory, providing advice to third parties, etc.

Use of property, systems and equipment

ISP provides employees with assets, equipment and systems to help them perform their duties and responsibilities in the best possible way.

All assets, equipment and systems provided are the property of and are provided for the benefit of ISP. However, ISP recognises that employees need to balance their personal and professional lives. It therefore allows for certain limited use in accordance with our Acceptable Use Policy.

All use, whether personal or ISP-related, must be proper, responsible, proportionate, effective and consistent with ISP and local data protection requirements. Employees should refer to our Acceptable Use Policy for further guidance.

Similarly, please note that personal telephones or devices may not be used in class or in areas where students are present, unless required in response to an emergency plan.

Email protocol

Good protocol for sending emails must be followed at all times.

- Before sending an *email*, consider whether this is the appropriate medium given the circumstances or whether it would be better to make a phone call, have a face-to-face conversation, hold a meeting, etc. We are often inundated with emails and it may be more appropriate to use other means of communication. Ideally, avoid using the "reply all" option unless other people would benefit from receiving the reply. We should avoid contributing to system congestion with trivial messages or by copying and forwarding emails to those who do not need to receive them.
- *Emails* should include a clear and concise subject line that summarises the purpose of the message.
- Greetings and farewells should be appropriate for the recipients and in keeping with their working relationship with the senders. A signature should be included so that recipients have the contact details of the person sending the email in case they need to follow up.
- It is important to take into account the culture of the recipients, as they will write differently and messages should be personalised accordingly.
- Special attention should be paid to tone and the use of humour. It is very easy for tone to be

misinterpreted without the context provided by facial expressions or voice. Exclamation marks, in particular, contribute to tone and should be used sparingly. Similarly, humour can be lost in translation, especially without the contribution of facial expressions or voice. There is always a risk that what one person finds funny will not be interpreted in the same way by another.

- Emails should always be proofread before sending to check for spelling, grammar, or content errors, as well as potential issues related to style and humour. If a message sounds harsh when reread, it is likely to be unwelcome to the recipient.
- A good tip for *emails* is to add the recipient's email address only when the message is ready to be sent. This prevents you from sending it too quickly by mistake. It is also wise to check that you have entered the correct address (this is especially important if there are employees or contacts with identical or similar names).

How do I report a breach of the Code of Conduct?

The relevant local **Complaints Procedure** should be used to raise **personal** complaints or **concerns**.

Colleagues are encouraged to report unacceptable behaviour or conduct to their line managers in the first instance. Line managers will decide on the best way to handle complaints. If the complaint concerns the line manager, colleagues can approach the line manager's superior or their local Human Resources department for advice.

Colleagues may also raise **concerns about misconduct** under the relevant local **Whistleblowing Procedure** if these are in the public interest, meaning that the issue must affect other parties (e.g. their school, ISP, work colleagues, the student or parent community, or the general public).

All staff members and volunteers should be aware of their duty to raise concerns about the behaviour or attitude of their colleagues.

[LINK whistleblowing policy.](#)

A report is not the same as a complaint and can be defined in the following ways:

- When someone behaves in a way that has harmed or could have harmed a child.
- When someone may have committed a crime against a child.
- When someone has behaved towards a child or children in a way that could put them at risk.

In the event of a report being made against a member of school staff (or volunteer), the matter will be dealt with by the headteacher unless a crime has been committed, in which case the report will be referred to the local authorities, if appropriate.

In any case (whether criminal or not):

- **The headteacher** must be informed of any **concerns** about inappropriate practices or possible child abuse **by colleagues**. Please complete the following form: [LINK](#) It is important that these reports are treated seriously and that the appropriate procedures are followed.
- Any **concerns about the headteacher** should be reported **to the immediate superior**. Regional Deputy Headteacher. Miguel Ángel Garrán: mgarran@ispschools.com
- Allegations relating to **staff who no longer work at the school**, or historical allegations, will be reported to the **police**.

No action will be taken to investigate a suspicion without first consulting ISP Health and Safety Director Andy Duffied and agreeing on the best course of action in accordance with national and local guidelines on these matters.

If, following this initial consultation, it is considered that there are grounds to proceed with the investigation, then the member of staff may be suspended from their duties. Suspension is a neutral act and does not in any way imply that the person is guilty of any offence. It is well understood that this situation could be distressing for the person involved and the school will do its utmost to balance the interests of any individual with the need to ensure the safety of children.

Justified reports that have reasonable grounds are considered a **disclosure of protected information** and, even if they turn out to be unfounded suspicions, no action will be taken against the person who reported the irregularity.

However, when a wrongdoing is reported **maliciously**, it will be treated as a possible disciplinary matter. The school has a *specific policy on reporting wrongdoing*, which must be followed in the event of such incidents.

"Staff members shall minimise the potential for complaints by ensuring that they are aware of what is expected of them under the staff code of conduct and the guide to safety at work."

Addressing breaches of the Code of Conduct

Minor breaches or **minor** compliance **issues** can **be dealt with informally**. This would usually involve line managers talking to the colleague who has committed the breach to discuss their behaviour and remind them of the required standards.

As part of the conversation, line managers should explain how and where the employee has failed to meet the standards. They should also inform the employee that further areas of non-compliance, as well as a lack of satisfactory improvement, could lead to the application of a formal disciplinary measure. If the non-compliance persists, or if the initial problem or violation is **serious enough**, the **formal disciplinary procedure** may be applied. In such cases, line managers should seek advice and guidance from the local Human Resources department before proceeding, to ensure that they are following local employment law and good practice.

The formal disciplinary procedure is applied to address issues of unacceptable conduct, punctuality or attendance, as well as other employee behaviour problems. These include serious and flagrant misconduct. The following offences are examples of misconduct:

- Violation of our policies or failure to comply with our processes and procedures
- Breach of the employment contract.
- Damage to or unauthorised use of our property.
- Persistent tardiness.
- Persistent or unauthorised absenteeism.
- Wasting time, neglecting, evading or failing to fulfil responsibilities.
- Refusal to follow reasonable instructions.
- Excessive use of our telephones to make or receive personal calls.

- Excessive use of email or the Internet for personal matters.
- Negligence in the performance of duties.
- Smoking in smoke-free areas.
- Disrespectful or abusive behaviour.
- Intimidation or abuse towards other employees.
- Sexual harassment, racial harassment, or other types of harassment.

These examples are not exhaustive or exclusive. Similar offences will be dealt with under the relevant disciplinary procedure.

Serious misconduct

Serious or gross misconduct refers to serious acts of misconduct that may result in immediate dismissal. Below is a non-exhaustive list of possible examples of serious or gross misconduct:

- Fraud, forgery, or other dishonesty, such as falsifying expense claims.
- Serious breach of confidentiality, whether through misconduct or negligence.
- Actual violence or threat of violence, as well as behaviour that provokes violence.
- Deliberate damage to our buildings, facilities, property or equipment, or to the property of students, employees, contractors, customers or members of the public.
- Serious misuse of our property or our name (whether ISP or any college).
- Deliberate access to websites containing pornographic, illegal, offensive, immoral or obscene material.
- Repeated or serious disobedience in following instructions, or any other serious act of insubordination.
- Conduct that could bring serious discredit to ISP or its schools.
- Violation of our Child Protection and Safeguarding Policy.
- Violation of our Modern Slavery Policy.
- Being under the influence of alcohol, drugs or other substances during working hours.
- Loss, damage or injury caused by gross negligence.
- Serious or repeated failure to comply with health and safety regulations or serious misuse of safety equipment.
- Unauthorised use or disclosure of confidential information, or failure to ensure the security of confidential information.
- Accepting or offering a bribe or other secret payment.
- Acceptance of gifts above nominal value from students, parents, suppliers, contractors or other third parties related to employment, without the prior consent of line managers.
- Conviction of a criminal offence which, in our opinion, may affect the reputation of the organisation or our relationship with staff, customers or the public, or which in any way affects your suitability or ability to continue working for us.
- Possession, consumption, supply or attempted supply of drugs.
- Serious dereliction of duty or a serious or deliberate breach of your contract or operating procedures.
- Knowing breach of legislative, statutory or regulatory rules affecting your work.
- Unauthorised use, processing or disclosure of personal data contrary to our Data Protection Policy.

- Intimidation or harassment of employees, contractors, students or parents, or discrimination against them.
- Refusal to disclose any information required by the nature of the job or any other information that may be relevant to the performance of duties.
- Lying, misrepresentation or deliberate withholding of material information on a CV or job application.
- Providing false information, such as qualifications or the right to work, in order to obtain employment or other benefits.
- Dissemination of false or misleading information under our Whistleblowing Policy.
- False accusations made in bad faith against an employee.
- Serious misuse of our information technology systems (including misuse of developed or licensed software, unauthorised downloading or use of software, and misuse of email or the internet).
- Engaging in unauthorised employment (paid or unpaid) during working hours.
- Unauthorised access to an area of the premises where entry is prohibited.

These examples are not exhaustive or exclusive. Similar offences will be dealt with under the relevant local disciplinary procedures.

Serious or flagrant offences may result in immediate dismissal in accordance with relevant national employment legislation. Dismissal will be notified in writing.

