Staff Code of Conduct

Reviewed by: Designated Safeguarding Lead - Charlotte Burdett
Approved by: Chair of Trustees - Richard Nobles
Date approved: November 2026

Next review due: November 2027

1. Purpose and scope

Waldorf Cambridge expects all adults in the school community to conduct themselves in a way that reflects its vision and values and promotes the safety and wellbeing of children.

This **Staff Code of Conduct** sets out the standards of behaviour expected of all adults working in or for the school. It is intended to:

- promote a safe, respectful and inclusive environment for pupils, staff and families
- protect pupils from harm and adults from false or misplaced allegations
- ensure that professional boundaries are clear and consistently understood
- support a culture in which concerns about children and about adults are raised and addressed quickly.

This document is the school's **Staff Behaviour Policy (Code of Conduct)** as required by the Department for Education's statutory guidance Keeping Children Safe in Education (KCSIE) 2026, which came into force on 1 September 2026.

It also forms part of the arrangements through which the proprietor meets the safeguarding and welfare requirements of the **Education (Independent School Standards) Regulations 2014** (as amended), and it reflects what Ofsted inspectors evaluate under the inspection framework for non-association independent schools.

Who this Code applies to

In this document, the term **"Staff"** includes:

- all employees of Waldorf Cambridge
- volunteers and helpers
- trustees / governors
- supply and agency staff
- peripatetic teachers and coaches
- contractors and self-employed adults working on site when children are present
- students on placement and trainees.

Everyone in these groups is expected to read, understand and follow this Code whenever they are working with or around pupils, whether on the school site, on trips and visits, online, when working remotely, or in any other context where they are acting in a professional capacity for Waldorf Cambridge.

2. Vision, values and principles

Waldorf education seeks to support the healthy development of the whole child - head, heart and hands - in a community of respect, curiosity and care. Staff are expected to:

- model kindness, fairness and integrity
- treat all pupils and colleagues with dignity, regardless of any protected characteristic under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) or their family background
- help to create a calm, ordered and nurturing environment in which pupils can learn and thrive
- recognise and respond to pupils' individual needs with empathy and appropriate professional distance.

While staff will bring their own gifts and individuality to their work, behaviour must always be **consistent with the school's ethos and values** and with this Code of Conduct.

3. Statutory and policy framework

This Code should be read alongside, and is underpinned by, the following key documents:

- **Keeping Children Safe in Education (KCSIE) 2026** (DfE - statutory guidance)
- **Guidance for safer working practice for those working with children in education settings** (Safer Recruitment Consortium - non-statutory guidance, current edition)
- **Working Together to Safeguard Children 2026** (statutory guidance)
- **Teachers' Standards** (for teaching staff, in particular Part Two: personal and professional conduct)
- **Education (Independent School Standards) Regulations 2014** (as amended) and the DfE's **Independent School Standards guidance (April 2026)**, including the standards on safeguarding (paragraph 7), suitability of staff (Part 4) and the recording and reporting of restrictive interventions (paragraphs 16A and 32A)
- **Restrictive interventions, including use of reasonable force, in schools** (DfE guidance, in force from April 2026)
- **Information sharing duty: statutory guidance** (September 2026), issued under section 16LA of the Children Act 2004
- **Sharing nudes and semi-nudes: advice for education settings** (UKCIS)
- **Ofsted's independent school inspection toolkit and operating guides** for non-association independent schools (updated September 2026)
- key legislation, including: the Children Act 1989 and 2004; the **Children's Wellbeing and Schools Act 2026**; the **Crime and Policing Act 2026**; the Sexual Offences Act

2003 (including the abuse of position of trust offences); the Protection of Children Act 1978; the Safeguarding Vulnerable Groups Act 2006; the Equality Act 2010; the Counter-Terrorism and Security Act 2015 (Prevent duty); the Online Safety Act 2023; the Data Protection Act 2018 and UK GDPR (as amended by the Data (Use and Access) Act 2025); the Public Interest Disclosure Act 1998; and, where applicable, the Childcare (Disqualification) Regulations 2018.

It operates in conjunction with the school's own policies, including:

- Child Protection & Safeguarding Policy
- Behaviour Policy (including child-on-child abuse, bullying and the use of mobile phones)
- Online Safety / ICT Acceptable Use Policies (including mobile devices, filtering and monitoring, and AI)
- Whistleblowing Policy
- Low-Level Concerns Policy and Managing Allegations against Staff procedures
- Grievance / Dignity at Work Policy
- Educational Visits Policy
- Equality and Anti-Discrimination Policy
- Data Protection & Confidentiality Policy
- Health and Safety Policy
- Restrictive Interventions Policy (including reasonable force, restraint and seclusion)
- Intimate Care, Supporting Pupils with Medical Conditions (including allergy safety) and Administration of Medicines policies
- Prevent / Anti-Radicalisation guidance.

4. Safeguarding and safer working practice

Safeguarding is everyone's responsibility. All staff must:

- put the welfare of children at the centre of their practice
- know how to recognise, record and report concerns about a child
- know how to raise concerns about the conduct of another adult
- know who the DSL and deputy DSLs are and how to contact them, including out of hours and on educational visits
- know that if a child is in immediate danger they should call 999, and that anyone can make a referral directly to children's social care (Cambridgeshire) if needed, informing the DSL as soon as possible
- read Part One of KCSIE 2026 in full and always follow this Code and all safeguarding policies.

4.1 Position of trust and professional boundaries

All adults working for Waldorf Cambridge are in a **position of trust**. Staff must:

- always maintain clear professional boundaries with pupils

- use their professional judgement, but never in ways that conflict with this Code or with safeguarding guidance
- not develop or encourage relationships with pupils that are, or could be interpreted as, sexual, exploitative or otherwise inappropriate
- avoid any behaviour that could be misinterpreted or give rise to concern.

Staff **must not**:

- engage in, pursue or respond to any sexual or romantic contact or relationship with a pupil of any age. Sexual activity between an adult in a position of trust and a person under 18 in their care is a **criminal offence** under the Sexual Offences Act 2003, regardless of consent
- encourage "secrets" or exclusive, special relationships with pupils
- give or accept gifts, favours or hospitality from pupils or families that could be seen as creating obligation or favouritism
- meet pupils socially or in private settings without prior approval and explicit safeguarding consideration by the school
- behave in ways that could be seen as grooming, for example singling a pupil out for special attention, gifts or privileges, or seeking contact outside agreed professional channels
- use their position to intimidate, threaten, coerce or undermine pupils.

If staff are unsure whether a situation might breach boundaries, they must **seek advice from the DSL or a senior leader at once**.

Staff must tell the DSL if a pupil appears to have developed an infatuation with them or with another adult, so that it can be managed sensitively and recorded. Any relationship with a former pupil, particularly one who has recently left or is still under 18, should be declared to the DSL.

4.2 One-to-one situations

One-to-one work with pupils is sometimes necessary and beneficial, but it can make staff and pupils more vulnerable to allegations. Staff should:

- wherever possible, use rooms with visibility (glass panels or open doors)
- avoid working in remote or secluded areas
- make sure another adult knows about any planned one-to-one session (time, place, purpose)
- record any unplanned one-to-one contact that might be open to misinterpretation
- never transport pupils alone in their own vehicle unless specifically authorised and risk-assessed by the school.

4.3 Physical contact

Some physical contact with pupils may be appropriate or necessary (for example in first aid, support with personal care, physical intervention to prevent harm, or to offer age-appropriate comfort and reassurance).

Physical contact must always be:

- in the child's **best interests**
- **necessary, proportionate and time-limited**
- respectful of the pupil's age, stage of development, sex, culture and any special educational needs or disabilities
- in line with the school's Behaviour Policy and Restrictive Interventions Policy.

Staff must:

- be aware that even well-intentioned contact can be misinterpreted
- avoid physical contact which could be seen as sexual, secretive, rough, or as a punishment
- record and report any incident of physical intervention or contact which causes concern.

4.4 Restrictive interventions (reasonable force, restraint and seclusion)

Staff may use reasonable force only where it is necessary and proportionate to prevent a pupil from harming themselves or others, committing an offence, damaging property, or seriously prejudicing good order and discipline. Since April 2026, schools have been legally required to record uses of force, restraint and seclusion and report them to parents; for Waldorf Cambridge this applies through the Independent School Standards (paragraphs 16A and 32A). Staff must:

- use de-escalation and other non-physical strategies first, and use restrictive interventions only as a last resort
- never use force or seclusion as a punishment, and never use a technique they have not been trained to use
- understand that preventing a pupil from leaving a room or space (for example by blocking the exit, securing the room, or making the pupil believe they will be punished if they leave) is **seclusion** and must be treated as a restrictive intervention
- follow any behaviour support plan or risk assessment in place for the pupil, including for pupils with SEND
- make a written record of every incident **as soon as practicable, and ideally the same day**, and tell the DSL or a senior leader, so that the school can tell parents as required and review the incident with the pupil and staff involved.

4.5 Toilets, changing and overnight supervision

Staff must:

- follow the school's arrangements for toilets and changing, which reflect KCSIE 2026 and the premises standards in Part 5 of the Independent School Standards, and respect pupils' privacy and dignity
- supervise changing in a way that is appropriate to the pupils' age and needs, avoid being present unnecessarily, and never use any device to take images in toilets or changing areas
- on residential and overnight visits, follow the visit risk assessment and the school's single-sex sleeping arrangements, and not share a bedroom, dormitory or tent with a pupil except in an emergency, recording and reporting any such situation to the visit leader and DSL.

4.6 Duty to report child sexual abuse

Any concern that a child may be experiencing, or has experienced, sexual abuse must be reported to the DSL **immediately**. Staff must never investigate it themselves and must never promise a child that they will keep it secret.

The **Crime and Policing Act 2026** (Royal Assent 29 April 2026) introduces a legal duty for adults in regulated activity with children in England to report child sexual abuse when a child or the person responsible tells them about it, or when they witness it (including in images or recordings). At the date of this Code the duty is still to be brought into force. Staff will be told when it commences, and the school's procedures will ensure that reports are made to the police and children's social care as the law requires. Preventing or deterring anyone from making such a report will be a criminal offence. The school will treat any attempt to do so, at any time, as a serious disciplinary and safeguarding matter.

5. Professional behaviour and relationships

5.1 Respectful, inclusive conduct

Staff are expected to:

- treat pupils and colleagues with courtesy and respect at all times
- use language that is calm, professional and non-demeaning
- avoid sarcasm, humiliation or public shaming
- challenge and report discriminatory, bullying or abusive language or behaviour, including racism, faith-based prejudice, misogyny, homophobia and transphobia. KCSIE 2026 makes clear that prejudice-based behaviour and discrimination are safeguarding issues as well as behaviour issues.

5.2 Bullying and harassment between adults

- Waldorf Cambridge is committed to a working environment where all adults are treated with dignity and respect. Bullying, harassment or victimisation of colleagues - including repeated undermining, intimidation, exclusion, gossip or abusive language - is not acceptable and may be dealt with as a disciplinary matter. Staff who experience or witness such behaviour should report it to a senior leader (or, where the concern is about a senior leader, to the Chair of Trustees) in line with the school's Grievance / Dignity at Work procedures. Where an adult's behaviour also raises a concern about the safety of children, it must be reported under Sections 8 and 9 of this Code.
- Sexual harassment of staff, including by parents, visitors or contractors, will not be tolerated. Under the Equality Act 2010 (as amended), the school is required to take **all reasonable steps** to prevent sexual harassment of its employees, including harassment by third parties (from 30 October 2026). Staff should report any such harassment promptly and must not take part in or ignore it.

5.3 Equality, diversity and inclusion

Staff must uphold the principles of equality legislation and school policy, and:

- never discriminate against pupils or staff on any protected characteristic
- be sensitive to the experiences of pupils and families from different cultures, backgrounds and identities
- not express personal beliefs in ways that exploit pupils' vulnerability or could cause harm or discrimination
- not promote partisan political views to pupils, and make sure that where political issues are raised, pupils are offered a balanced presentation of opposing views (Independent School Standards, Part 2)
- not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- follow the school's procedures and KCSIE 2026 guidance on **children who are questioning their gender**: treat the pupil with kindness and respect; do not initiate or encourage social transition; refer any request for changes (for example to name, pronouns, uniform or facilities) to the DSL, who will normally involve parents unless doing so would put the child at greater risk; and where a pupil confides that they are questioning their gender without asking for any changes, do not break that confidence unless there is a related safeguarding risk.

5.4 Confidentiality and information-sharing

Staff will often have access to confidential information about pupils, families or colleagues. They must:

- treat such information with care and only share it on a **need-to-know** basis

- use secure, school-approved systems for storing and transmitting information, comply with the Data Protection Act 2018 and UK GDPR, and report any actual or suspected data breach immediately in line with the Data Protection Policy
- never discuss pupils or colleagues in public places or on social media.

However, **safeguarding concerns must never be kept secret**. Where there is a concern that a child may be at risk of harm, staff have a duty to share information with the DSL or another safeguarding lead without delay, even if the pupil has asked for it to be kept confidential.

KCSIE 2026 reflects the new **information sharing duty** introduced by the Children's Wellbeing and Schools Act 2026 (in force from 30 September 2026). Information relevant to a child's safety or welfare should be shared proactively with the agencies who need it, unless sharing would be more detrimental to the child. Consent is not required for this, and data protection law is not a barrier to sharing information to keep a child safe. Staff fulfil their part by passing concerns and relevant information to the DSL promptly; the DSL decides on and records onward sharing.

6. Use of technology, social media and images

KCSIE 2026 (Part Two) expects the staff behaviour policy to cover the acceptable use of technologies (including mobile devices), staff/pupil relationships and communications, including via social media.

6.1 Digital communication with pupils and families

Staff must:

- use only **school-approved systems** (email addresses, platforms, messaging tools) for communicating with pupils and parents/carers
- keep communication professional in tone, content and timing
- not share personal phone numbers, personal email addresses or personal social media accounts with pupils
- report to the DSL any attempt by a pupil to contact them through personal channels, and any communication from a pupil that causes concern.

Staff must **not**:

- communicate with pupils through personal messaging apps, private social media accounts or "disappearing message" platforms
- engage in online conversations with pupils that are secretive, flirtatious, sexual, or could otherwise cause concern

6.2 Social media and online reputation

Staff should:

- ensure their online presence (including privacy settings) does not compromise their professional role
- avoid posting comments, images or material that could bring the school into disrepute or call their suitability into question
- never post images or information about pupils, colleagues or school activities on personal accounts.

Staff must not "friend", "follow" or otherwise connect with pupils on personal social media. Exceptions (for example where staff are already family friends) must be declared to the DSL and risk assessed.

6.3 Use of personal devices, mobile phones and images

- Staff should always follow the school's Online Safety / ICT Acceptable Use Policies.
- Personal mobile phones and smart devices must not be used in the presence of pupils, except in an emergency or where specifically authorised (for example as a contact phone on an educational visit), in line with the school's mobile phone policy.
- In the Kindergarten (EYFS), personal phones and cameras must be stored away from areas where children are present, in line with the EYFS statutory framework.
- Photographs and videos of pupils must only be taken:
    - for legitimate educational or safeguarding purposes
    - using school-approved devices and systems
    - in line with parental consent and Data Protection requirements.

Staff must not:

- use personal devices to take, store or share images of pupils
- keep images of pupils on personal equipment or cloud storage
- make, view, possess or share any indecent images of children, including images generated or altered using AI (sometimes called "deepfakes"); this is illegal and will always be treated as a safeguarding and criminal matter.

If staff become aware that a pupil has made, sent or received **nudes or semi-nudes** (including AI-generated or altered images), they must **not** view, copy, print, forward, save or delete the image, or ask the pupil to show or send it. They must refer the matter to the DSL immediately, following the UKCIS guidance. If an image is seen accidentally, this must be reported to the DSL straight away.

6.4 Artificial intelligence (AI)

Staff must:

- use only AI tools approved by the school for school work, in line with the Online Safety / ICT Acceptable Use Policies and DfE guidance on generative AI in education
- never enter pupils' or colleagues' personal data, safeguarding information or confidential school information into an AI tool that has not been approved for that purpose
- never use AI to create, alter or manipulate images, video or audio of pupils, colleagues or parents
- check AI-generated material for accuracy and suitability before using it with pupils, and remain professionally responsible for it
- report to the DSL any concern about AI-generated harmful content, including deepfakes, involving pupils or staff.

6.5 Filtering and monitoring

All staff must understand the school's filtering and monitoring arrangements and their part in them. Staff must not try to bypass filtering. They must report to the DSL straight away if pupils can access harmful or inappropriate content, if filtering appears to be blocking legitimate teaching material, or if monitoring raises a concern. Staff should be aware that their use of school devices, networks and accounts is monitored.

7. Conduct outside work

Staff are expected to uphold the reputation of Waldorf Cambridge and maintain their suitability to work with children at all times, including outside work.

Staff must:

- avoid behaviour in their private life that could:
    - damage public confidence in them or the school
    - bring the school into disrepute
    - indicate that they may pose a risk to children or be unsuitable to work with them
- notify the DSL **without delay** if they are:
    - subject to a police investigation
    - cautioned, charged or convicted of a criminal offence
    - involved in any situation which may have safeguarding implications
    - the subject of an allegation, investigation or referral by another employer, setting, regulator or children's social care, including one that did not involve children but may show a transferable risk
    - in a close relationship or association, inside or outside work, with someone they know poses a risk to children (for example a person who is barred or subject to sex offender notification requirements)

- working in the Kindergarten (EYFS), or in childcare for children under 8 outside school hours, and aware of anything that could disqualify them under the Childcare (Disqualification) Regulations 2018.

The school will consider whether such matters need to be referred to external agencies (e.g. the Local Authority Designated Officer (LADO), Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA)). The proprietor has a legal duty under the Safeguarding Vulnerable Groups Act 2006 to refer to the DBS anyone who has been removed from regulated activity (or would have been, had they not left) because they harmed, or pose a risk of harm to, a child. The proprietor must also consider referral to the TRA where a teacher may have committed serious misconduct. Staff who report matters about themselves promptly and honestly will be treated fairly.

8. Low-level concerns about adults

In line with KCSIE 2026, Waldorf Cambridge promotes a culture where all concerns about adults are taken seriously, responded to, and recorded appropriately.

A **low-level concern** is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with this Code of Conduct, including behaviour outside work, and
- does **not** meet the harm threshold, or is otherwise not serious enough to consider a referral to the LADO.

"Low-level" does not mean insignificant. Sharing low-level concerns helps the school spot patterns early and keeps both children and adults safe.

Examples might include (this is not an exhaustive list):

- being over-familiar with pupils
- using inappropriate jokes, nicknames or language
- having "favourites"
- blurred professional boundaries or poor judgement in one-to-one situations
- minor breaches of the ICT or social media expectations
- taking photographs of pupils on a personal device, contrary to this Code
- humiliating pupils.

All staff **must report low-level concerns** as soon as possible to the **DSL**. Concerns about the DSL or a member of the Senior Leadership Team should be reported to the **Chair of Trustees.**

Staff are encouraged to **self-refer** if they find themselves in a situation that could be misinterpreted, or if they think their own behaviour may have fallen below the standards in this Code. If staff are unsure whether a concern is low-level or meets the harm threshold, they should report it anyway; the DSL will seek advice from the LADO where needed.

Concerns about supply staff, contractors or other adults working on site should be reported in the same way, and the school will inform their employer where appropriate.

Low-level concerns will be recorded and responded to in line with the school's Low-Level Concerns Policy, and in accordance with KCSIE 2026. Records are kept confidential and securely, reviewed so that patterns can be identified, and retained at least until the individual leaves the school's employment.

9. Allegations and serious concerns about adults

Where it is alleged that a member of staff, volunteer, supply or agency worker, contractor or trainee has:

- harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children (including behaviour occurring outside school),

staff must **report this immediately** to the DSL (or to the Chair of Trustees if the allegation is about the DSL).

The DSL will:

- follow the school's Managing Allegations procedures
- seek advice from the Local Authority Designated Officer (LADO) within one working day of any allegation that appears to meet the harm threshold, and before any investigation or discussion with the person concerned
- ensure that children are safeguarded, and that staff are treated fairly and in line with statutory guidance.

Staff must not:

- attempt to investigate allegations themselves
- discuss the allegation with anyone other than those who need to know as part of the process
- tell the person who is the subject of the allegation about it (the DSL will decide, after consulting the LADO, what can be shared and when).

Staff who are the subject of an allegation will be treated fairly, kept informed as far as possible, and offered support throughout the process.

10. Whistleblowing

Staff, volunteers, contractors and supply staff must feel able to raise concerns about:

- practices that may put children at risk
- suspected wrongdoing or misconduct by adults, including sexual harassment
- failures in the school's safeguarding arrangements.

Concerns should normally be raised through the school's **Whistleblowing Policy**, which sets out internal routes (e.g. Leadership Team, Chair of Trustees, safeguarding trustee).

If a staff member feels unable to raise a concern through the school's procedures, or believes their concern is not being properly addressed, they may contact:

- the Local Authority Designated Officer (LADO)
- the NSPCC Whistleblowing Advice Line (0800 028 0285; help@nspcc.org.uk)
- Ofsted's whistleblowing line (0300 123 3155; whistleblowing@ofsted.gov.uk), as Ofsted is the prescribed body for concerns about independent schools it inspects.

Staff who raise a concern that they reasonably believe is in the public interest are protected from detriment and dismissal under the Public Interest Disclosure Act 1998. Since 6 April 2026 this explicitly includes disclosures about sexual harassment. The school will not tolerate victimisation of anyone who raises a concern.

11. Gifts, hospitality and conflicts of interest

Staff must:

- act with integrity in all financial matters
- declare any actual or potential **conflict of interest** to a senior leader, so that it can be recorded and managed
- seek approval in advance before providing private paid services (for example tutoring, therapy, coaching or childcare) to current pupils or their families, and declare any close personal relationship with a parent or colleague that could affect, or be seen to affect, their professional role
- only accept gifts or hospitality from pupils, parents or suppliers which are:
    - of small, token value, and
    - recorded in line with school procedures.

Staff must never solicit gifts or use their position for personal gain.

12. Dress and appearance

Staff are role models for pupils. Dress and appearance should:

- be **clean, tidy and appropriate** to a professional educational environment

- support rather than undermine the calm, respectful tone of the school
- allow staff to carry out their duties safely.

Clothing, jewellery or accessories should not be offensive, overly revealing or display slogans/images inconsistent with the school's ethos.

13. Implementation, training and review

- This Code of Conduct is issued to all staff **as part of their induction**.
- All staff must:
    - read this Code and **Part One of KCSIE 2026 in full (Annex A no longer exists in KCSIE 2026, and the DfE's 'Part one: overview for all staff' is a quick reference only; it does not replace Part One)**
    - sign to confirm they have done so, and that they understand their responsibilities.
- Safeguarding and safer working practice form part of **regular training and updates** for all staff, including online safety, filtering and monitoring, restrictive interventions and the changes introduced by KCSIE 2026.
- Breaches of this Code may lead to disciplinary action and, where relevant, referral to the LADO, police, DBS or TRA.
- The Code will be reviewed at least **annually**, or sooner if there are changes to legislation, statutory guidance, or to the school's policies.

Appendix 1 - Staff declaration

Staff Code of Conduct - Declaration

I confirm that I have received, read and understood the **Staff Code of Conduct - Code of Conduct for all adults in school (November 2026)** for Waldorf Cambridge.

I understand that:

- this Code forms part of the terms and conditions of my role
- if I am unsure whether a course of action is appropriate, I must seek guidance from a senior leader or the Designated Safeguarding Lead
- any breach of this Code may be treated as a disciplinary matter and, in serious cases, may also be a safeguarding and/or criminal matter
- I have read Part One of Keeping Children Safe in Education 2026 in full.

Name: _____
Role: _____
Signature: _____
Date: _____