

SWRAC

Staff Code of Conduct

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Statement of Intent

SWRAC expects all students to receive high-quality teaching and learning in a positive and respectful environment.

Employees at SWRAC should ensure that their own behaviour, and the manner in which they conduct themselves with colleagues, students, parents and other stakeholders, sets a positive and professional example for students.

We recognise that the majority of staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This policy forms part of a staff member's contract of employment and failure to comply with it, along with the associated SWRAC policies, may result in disciplinary action being taken, including legal action where this is warranted.

This document applies to staff members who are:

- Employed by SWRAC, including the Managing Director and volunteers.
- Employed in units or bases that are attached to SWRAC.

This document does not apply to:

- Employees of external contractors.

These employees are governed by their employment contracts and any relevant laws pertaining to their activities within SWRAC, for example, the UK GDPR and the Data Protection Act 2018.

1. Legal framework

This policy has due regard to all legislation including, but not limited to, the following and including any amendments thereto or Regulations where the context so admits:

- The General Data Protection Regulation (GDPR)
- The Data Protection Act 2018
- The Education Act 2002
- The Children Act 1989
- Sexual Offences Act 2003

This policy also has due regard to statutory guidance including, but not limited to, the following:

- DfE (2023) 'Keeping children safe in education'

- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Staffing and employment advice for Schools'

This policy operates in conjunction with the following policies and documents:

- SWRAC19 - Child & Vulnerable Adult Protection and Safeguarding Policy
- SWRAC05 - Health and Safety Policy
- SWRAC07 - Data Protection Policy
- SWRAC57 - Allegations of Abuse Against Staff Policy
- SWRAC02 - Equality & Diversity Policy
- SWRAC49 – Compassionate Leave and Time off in Lieu Policy
- SWRAC62 – Sickness Absence Policy
- SWRAC08 - Whistleblowing Policy
- SWRAC32 – Online Safety Policy
- SWRAC48 – Disciplinary Procedure
- SWRAC61 – Staff Handbook

2. Professional behaviour and conduct

Staff are expected to demonstrate consistently high standards of personal and professional conduct such that public confidence in their integrity is sustained.

Staff will:

- Have proper and professional regard for the ethos, policies and practices of SWRAC.
- Maintain high standards in their attendance and punctuality.
- Take care of themselves and others affected by their activity at SWRAC
- Cooperate with the Senior Management Team in meeting their duties under the relevant regulations.
- Treat students, parents, colleagues and external contacts with dignity and respect.
- Observe proper boundaries appropriate to their professional position, showing tolerance of and respect for the rights of others.
- Inform the Managing Director if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- Be aware that professional behaviour and conduct is expected to be extended to extracurricular trips and visits.
- Act appropriately in terms of the views they express – in particular, political views – and the use of SWRAC resources at all times.

Staff will not:

- Use foul or abusive language.
- Perpetrate discrimination, bullying, harassment, or intimidation, including physical, sexual and verbal abuse.
- Misuse or misrepresent their position, qualifications, or experience.
- Seek to bring SWRAC into disrepute.
- Use SWRAC resources for political purposes.

3. Safeguarding students

In accordance with 'Keeping children safe in education 2023' (KCSIE), staff have a responsibility to safeguard students, protect and promote their welfare, and ensure that they provide a learning environment in which students feel safe, secure and respected.

To effectively safeguard students, staff are required to follow the procedures outlined in this Staff Code of Conduct, the Behaviour Policy and the Child and Vulnerable Adult Protection Safeguarding Policy and ensure that they do not act in a way that may put students at risk of harm, or lead others to question their actions.

In accordance with SWRAC's Behaviour Policy and Child and Vulnerable Adult Protection Safeguarding Policy, staff will be prepared to identify students who may be subject to, or at risk of, various types of abuse and neglect, including, but not limited to, the following:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child-on-child abuse
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Domestic abuse
- FGM
- Serious violence

Copies of policies and a copy of Part one (or, where appropriate Annex A for staff not working directly with children) of KCSIE will be provided to staff at induction and when changes occur. Staff will have a clear understanding of SWRAC's policies and procedures with regards to safeguarding issues, e.g. abuse, and the important role they play in preventing harm against students.

In accordance with the SWRAC's Child and Vulnerable Adults Protection Safeguarding Policy, staff will also be aware of the factors that could increase a student's risk of being subject to safeguarding issues, including but not limited to:

- Students who need a social worker (Child in Need and Child Protection Plans).
- Children missing from education

- Students requiring mental health support.
- Children in Care (CiC), previously CiC and care leavers.
- Students with SEND or health issues
- Students who identify as or are perceived to be LBGTQ+

If a member of staff has any concerns about a student's welfare, they will act on them immediately. They will follow the necessary reporting and referral procedures outlined in the Child and Vulnerable Adults Protection Safeguarding Policy and speak to the DSL. Staff will be aware of the procedures to follow if a student tells them they are experiencing abuse, exploitation, or neglect.

In all cases, if a member of staff feels unsure as to whether an incident or student would be classed as a safeguarding concern, they will speak directly to the DSL and SWRAC recording system. Staff will not assume a colleague will take action and share information that might be critical in keeping children safe.

Staff will recognise, acknowledge, and understand that even if there are no reports of child-on-child abuse in SWRAC, this does not mean it is not happening. Staff will understand the scale of harassment and abuse and challenge inappropriate behaviours between peers that are abusive in nature and report any concerns regarding any form of abuse to the DSL without undue delay.

Any member of staff member that has concerns about another staff member's (including volunteers and supply staff) actions or intent or believes these actions may lead to a student being put at risk of harm, will report this in line with the Allegations of Abuse Against Staff Policy or Whistleblowing Policy immediately so appropriate action can be taken.

If the concern is regarding the headteacher, staff will report this to the chair of the governing board.

If a member of staff feels unable to raise an issue with SWRAC, they will use other whistleblowing channels, including contacting the NSPCC's helpline on 0800 028 0285 (between the hours of 8:00am and 8:00pm Monday to Friday) or email address help@nspcc.org.uk. Staff can also access guidance at www.gov.uk/whistleblowing. Fear about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of students.

Staff will undergo safeguarding and child protection training, including online safety, at induction. This training will be updated regularly, at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Staff will recognise that, when teaching students about safeguarding and online safety, a one-size-fits-all approach may not be appropriate for every student, and a more personalised or contextualised approach may be needed for students who are vulnerable, victims of abuse and/or have SEND.

Staff will be aware of their local early help process and understand their role in it.

Staff will be aware of the process for making referrals to children's social care service (CSCS) and for statutory assessments under the Children Act 1989, along with the role they may be expected to play in such assessments.

Staff will reassure victims that they are being taken seriously and that they will be supported and kept safe by SWRAC. They will never give the impression that students are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a student ever be made to feel ashamed for reporting an incident.

Staff will know how to manage the requirement to maintain an appropriate level of confidentiality, involving those who need to be involved, but will never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

Staff will be aware of SWRAC's legal duty to make a referral to the DBS where they consider an individual has engaged in contact that has harmed, or is likely to harm, a child.

4. Appearance and dress

SWRAC expects that staff will:

- Ensure that their appearance is clean and neat when at work or representing SWRAC.
- Dress in a manner that is appropriate to their role – SWRAC will make reasonable adjustments to uniform expectations to suit disabilities, medical conditions, and religious and cultural beliefs.
- Not wear clothing that could have implications for the health and safety of themselves, or others in their care.
- Remember that they are role models for students, and that their dress and appearance should reflect this.
- Not dress in a way that would cause embarrassment to students, parents, colleagues, or other stakeholders.
- Ensure that, if visible, tattoos do not cause offence to others; if tattoos are likely to cause offence, they must be covered up whilst in work.
- Ensure that jewellery and piercings are minimal and, in the health and safety interests of both staff and students, avoid anything that could catch or be caught by students.

5. Attendance

SWRAC expects that staff will:

- Attend work in accordance with their contract of employment and associated terms and conditions in relation to hours, days of work and holidays.
- Comply with SWRAC's notification of sickness absence procedures.
- Make routine medical and dental appointments outside of their working hours or during holidays where possible.
- Refer to the SWRAC's Staff Sickness and Absence Policy if they need time off for any reason other than personal illness.

- Follow SWRAC's absence reporting procedure when they are absent from work due to illness or injury.

6. Conduct outside of work

Staff may undertake work outside SWRAC, either paid or voluntary, provided that it does not conflict with the interests of SWRAC.

Staff will not engage in outside work which could seriously damage the reputation and standing of SWRAC, the employee's own reputation, or the reputation of other members of SWRAC's community. Staff will also not engage in outside work at a level which may contravene The Working Time Regulations 1998 or affect an individual's work performance.

Staff committing offences that involve violence, possession or use of illegal drugs, or sexual misconduct is unacceptable, and will result in disciplinary procedures in line with SWRAC's Disciplinary Policy and Procedure.

Staff will not engage in inappropriate use of social network sites which may bring themselves, SWRAC, SWRAC community or employer into disrepute. This is explored further in the Acceptable use of technology section of this policy.

7. Smoking, e-cigarettes, alcohol, and other substances

Staff will not smoke or vape on, SWRAC premises and whenever in the sight of students, parents or visitors.

Staff will not smoke or vape whilst working with or supervising students off-site, such as when on educational visits and trips.

Staff will report for work and remain in a condition to perform their duties free from the effects of drugs, alcohol or any other substances that may hinder judgement and cause changes in behaviour; this does not include over-the-counter painkillers such as paracetamol.

Staff will adhere to the provisions outlined within the Staff Drug and Alcohol Policy.

8. Transferable Risks

All staff and Advisory Board Members must be aware that the Police and/or the Local Authority Designated Officers will inform an employer where activities, behaviours, criminal activities and some health concerns may be considered to be sufficiently serious to impact on the safety of Children that individuals work with.

These are known as 'Transferable Risks' and cover a very wide range of activities but, as non-exhaustive examples, include the following :-

- Behaviour in a way in their private life that indicates they may pose a risk of harm to children
- Mental Health
- Historical and current use of IT
- Substance misuse
- Prescribed medication
- Personal relationships
- Police inquiries

Staff should inform the DSL if they consider that any aspect of their private life may be interpreted as a potential risk to children.

9. Health and safety

Staff will:

- Be familiar with, and adhere to, SWRAC's Health and Safety Policy and ensure that they take every action to keep themselves and everyone in SWRAC environment safe and well.
- with health and safety regulations, adhering to any rules, routines and procedures in place, and cooperate with SWRAC leaders and colleagues on matters relating to health and safety.
- Use the correct equipment and tools for the job and any protective clothing supplied.
- Adhere to their common law duty to act as a prudent parent would when in charge of students.

10. Conflicts of interests

SWRAC is aware that situations may arise where family interests or loyalties conflict with those of SWRAC; however, staff have an obligation to act in the best interests of SWRAC community to avoid situations where there may be a potential conflict of interest.

11. Maintaining professional relationships with students

12. SWRAC expects that staff will:

- Always maintain professional boundaries and relationships with students, and will consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead to others questioning their actions.
- Ensure that they do not establish social contact with students for the purpose of securing a friendship, or to pursue or strengthen a relationship.
- Ensure that they do not develop personal or sexual relationships with students: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, students.
- Only contact students via the SWRAC's established mechanisms: personal phone numbers, email addresses or social media platforms will not be used to contact students.

Staff are aware that they must not:

- Discuss personal information with students, such as concerning their lifestyle or marital status, unless it is directly relevant to the topic being taught.
- Correspond in a personal nature through any medium with students, e.g. phone calls or text messages, unless it is within the staff member's role and via an approved communication method, e.g. SWRAC emails.
- Adopt an ongoing support role beyond the scope of their position.
- Use personal equipment for approved activities, such as a personal camera, unless approved in writing by the SMT, and will not photograph, audio record or film students without authorisation from the SMT and consent from the student's parent, where appropriate.
- Save images, videos or audio recordings of students on personal devices, unless authorised by the SMT or parents.
- Upload images, videos or audio recordings of students to any location without consent from parents and the SMT.
- Discuss or share information regarding other students or members of staff; staff should be aware of their surroundings when speaking to others, as their conversations may be overheard.
- Ignore instances of sexual harassment and inappropriate behaviour amongst students.
- Invite or allow students to visit their home.
- Allow students to access staff members' personal devices.
- Attend students' homes or their social gatherings, unless approved by the SMT.
- Be alone with a student outside of teaching responsibilities, unless approved by the SMT.
- Enter changing rooms or toilets occupied by students, when supervision is not required or appropriate, use toilet facilities allocated to students, or undress in facilities intended for use by students.
- Not transport a student unless in line with the Driving Policy.
- Give personal gifts or special favours, or disproportionately single specific students out for special duties or responsibilities.
- Offer overnight, weekend or holiday care as a respite to parents without the approval of the headteacher.

Under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect to that child, even if the relationship is consensual.

Where inappropriate contact is made with students, this will be raised with the headteacher, and handled in line with SWRAC's Child Protection and Vulnerable Adult Safeguarding Policy and Staff Code of Conduct.

If a student is consistently attempting to befriend or contact a member of staff on social media, the member of staff will inform SMT as soon as possible.

Staff are strongly discouraged from forming personal relationships with former students, including on social media, as well as with the parents of any students on social media.

In the event of the SWRAC becoming aware of a close relationship between a member of staff and a former student which may raise concerns about their suitability to work with children, the Managing Director will contact the LA designated officer (LADO) for advice and guidance.

Any inappropriate contact made with former students will be handled in line with the Child Protection and Vulnerable Adults Safeguarding Policy and Staff Code of Conduct.

Appropriate language

Staff will be informed that students should not be treated as friends. Staff will not:

- Use inappropriate names or terms of endearment.
- Allow inappropriate conversations or enquiries of a sexual nature to occur.
- Comment on a student's appearance, including personal flattery or criticism.
- Treat students disrespectfully or discriminatorily, based upon their perceived or actual protected characteristics.
- Subject students to humiliation, profanity, or vilification.
- Allow or partake in suggestive humour, banter, jokes or innuendos of a sexual nature.
- Use obscene or inappropriate gestures and language.
- Partake in personal conversations, including on the phone, where this may be overheard by students.

13. Physical contact with students

All staff members will respect the personal space and privacy of all students and will avoid situations which unnecessarily result in close physical contact.

SWRAC understands that there are circumstances in which it is entirely necessary for staff to have physical contact with students, e.g. when applying first aid and assisting with intimate/medical care, but staff will only do so in a professional and appropriate manner in line with relevant SWRAC policies.

When physical contact is made with students, it is imperative that it is conducted in a way which is responsive to the student's needs, is of limited duration and is appropriate to their age, stage of development, gender, and background.

Staff will seek the student's permission, where possible, before initiating contact.

Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between students, and ensure that the student's feelings and wishes are always taken into account.

Staff will never touch a student in a way which is indecent and will be aware that even well-intentioned physical contact may be misconstrued by a student, an observer or by anyone to whom this action is described and, therefore, will always be prepared to explain their actions.

Staff will not engage in rough play, tickling or play fights with students.

Physical contact will never be secretive; if a member of staff believes an action could be misinterpreted, this will be reported to the Managing Director, or the chair of the Advisory Board if the concern is about the Managing Director, and appropriate procedures will be followed.

Where it is necessary for teachers to demonstrate use of equipment, this will be conducted with another member of staff if possible. If a student is required to participate, their consent will be given before doing so.

If a student is in distress and in need of comfort as reassurance, staff may use age-appropriate physical contact, such as placing their hand on the student's shoulder. Staff will always remain self-aware of their actions and ensure that their contact is not threatening, intrusive or subject to misinterpretation.

SWRAC acknowledges that situations may arise in which staff members will be required to use physical intervention, and in some cases reasonable force, in order to manage conflict, disruption and distressed behaviour when other measures have failed to do so. In these cases, staff will ensure that actions such as safe touch and reasonable force are used in a correct and safe manner, in accordance with the relevant legislation and national guidance and in line with the Behaviour Policy.

In all interactions with students' staff will always behave and act in a respectful and professional manner and staff will be aware that extra caution and consideration may be needed where it is known that a student has previously suffered from abuse or neglect.

14. Showering and changing

Staff will ensure that students are afforded respect and privacy whilst they are changing, e.g. before and after using the gym; however, a level of supervision is required to ensure that students are safe, and that they are not subjected to bullying.

The supervision will be appropriate to the needs and ages of the students, and sensitive to the potential for embarrassment.

Staff will adhere to the appropriate policies and risk assessments, e.g. gym risk assessment and ensure that appropriate supervision and support is given to all students, including those who may need assistance with showering and changing.

Where possible, female staff will supervise females and male staff will supervise males.

Staff will announce their intention of entering the changing room to allow students to maintain their privacy and will only remain in the changing room for as long as is necessary.

Staff will never change or shower in the same area as students.

15. Transporting students

Staff are aware that the safety and welfare of students is the responsibility of SWRAC until students are with their parents/care or at their homes. SWRAC is committed to taking all possible safety measures to ensure the safety of students.

When it is necessary to transport students off-site, staff will gain consent from parents before transporting students and adhere to the appropriate SWRAC policies and risk assessments, such as the Driving Policy, and the Lone Working Policy.

Staff will ensure that they:

- Hold a full valid driving licence for the category of vehicle being driven and providing their licence details to the headteacher where required.
- Drive in accordance with the laws of the road and Highway Code.
- Check before each journey that the vehicle is roadworthy, e.g. tyres are properly inflated and meet legal requirements.
- Ensure that they are fit to drive; where their fitness to drive may be impaired, e.g. due to a medical condition or taking medication, they inform their line manager as soon as possible and notify the DVLA where required.
- Notify HR where there is any change in their circumstance in relation to driving at work, e.g. if they acquire penalty points on their licence for motoring offences outside of work.

Staff will only use their own vehicle to transport students where there is no practical or reasonable alternative and agreed by their Line Manager. Only members of staff with the appropriate level of DBS check will be permitted to transport students.

When using their own vehicle to transport students, staff will ensure that their driving insurance is valid for the purposes of business use, including cover for persons travelling as business passengers, a copy of the insurance documentation should be sent to HR.

Staff will not offer students transport outside of their normal working duties, other than in an emergency or if a student is at risk. These circumstances will be recorded and reported in Databridge.

16. Acceptable use of technology

Staff are aware of the benefits and challenges associated with using technology in SWRAC. When using technology staff will always adhere to the various procedures, freedoms and limitations outlined in the relevant SWRAC policies, which include but are not limited to:

- Online Safety Policy

All staff will maintain a professional level of conduct in their personal use of technology.

Staff will be aware of how the use of technology can impact safeguarding and wellbeing issues, e.g. online abuse.

Staff will be vigilant to ensure their own behaviour is respectful and that students are using technology appropriately while under their care.

Personal devices

Personal devices are used in accordance with the provisions outlined in the policies above. Any personal electronic device that is brought into SWRAC is the responsibility of the user.

Staff are not permitted to use their personal devices during lesson time, other than in an emergency.

Staff are not permitted to use their personal devices to take photos or videos of students.

Social media

Staff will be aware that their conduct on social media can have an impact on their role and reputation within SWRAC.

Staff will remain mindful of their use of social media and their web-based presence including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, SWRAC, or the SWRAC community into disrepute.

Staff are required to employ the highest security settings on any personal profiles they may have.

Staff will not engage in inappropriate use of social networking sites including contacting students or their family members, accepting or inviting friend requests from students or their family members, or following students or their family members on social media.

17. Photography, images and videos

All staff will act in accordance with the SWRAC policy of not keeping any images on personal or company devices, such images or video should be downloaded and store appropriately.

Photographs, images and videos will only be taken using SWRAC equipment – using personal mobile phones for this purpose is prohibited and taking images of students will not be taken for personal use.

Staff will ensure that imagery and videos will be kept in an appropriate and secure place in SWRAC.

No student will be photographed in a state of undress or semi-undress, or in a situation which could be considered as indecent or sexual.

Staff will not take images of a student's injury, bruising or similar (e.g. following a disclosure of abuse), even if they have been requested to do so by children's social care and staff members will not make audio recordings of any disclosure made by a student.

Consent for taking photographs will be obtained from parents/carers, or the student themselves, if they are deemed old enough and able to make the decision for themselves.

The age of consent that is legislated is 13 and above; however, this is only applicable for online services provided directly to children. For everything else, an appropriate age of consent is considered on a case-by-case basis by the DPO, the Managing Director and a student's parents/carer (where appropriate).

Students who have not provided consent, either personally or via their parents/carers, to have their photograph taken or be filmed will have their wishes respected.

The Head of Quality and Learning will be notified of the proposed use of the imagery or video and the equipment and ensure that the use of such is included in lesson plans where this is necessary.

All photographs and videos will be available for scrutiny, and staff will be prepared to explain and justify the images or footage taken.

Careful consideration will always be given to the activities which are being filmed or photographed, to ensure that images or videos are not indecent and cannot be misused.

18. Premises, equipment, and communication

Staff are responsible for:

- Being aware of and following the requirements of SWRAC security.
- Securing windows and doors when rooms are not in use.
- Ensuring that visitors sign in and out at the reception.
- Challenging any unidentified individuals and notifying the Centre Manager of any unauthorised person, who in turn will inform the Managing Director.
- Securing valuable equipment after use.
- Ensuring the security of SWRAC equipment when taken off the premises, such as laptops.
- Acting in accordance with SWRAC's Data Protection Policy and ensuring that data and information is secure.
- Reporting any minor security concerns to the Centre Manager.
- Reporting major security concerns directly to the police or emergency services, where appropriate.
- Wearing their SWRAC lanyard at all times.
- Being responsible for the security of any of their own property that they bring to SWRAC.
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SWRAC equipment and systems are available only for SWRAC-related activities and will not be used for the fulfilment of another job or for personal use, unless specifically authorised by the Managing Director. Illegal, inappropriate, or unacceptable use of SWRAC equipment or communication systems may result in disciplinary action and, in serious cases, could lead to an employee's dismissal.

Employees receiving inappropriate communication or material, or who are unsure about whether something they propose to do might breach this policy, should seek advice from their line manager.

SWRAC reserves the right to monitor emails, phone calls, internet activity or document production on SWRAC-owned equipment, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.

Communication systems may be accessed when SWRAC suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

Passwords should not be shared and access to computer systems must be kept confidential except on the express request of the headteacher or systems manager. Breaches of this confidentiality may be subject to disciplinary action.

SWRAC equipment that is used outside the premises, e.g. laptops, will be returned to SWRAC when the employee leaves employment or if requested to do so by SMT.

19. Data protection and confidentiality

All staff will be aware of their responsibilities as laid out in the Data Protection Policy and in line with the core principles of the UK GDPR and the Data Protection Act 2018.

Staff members will not disclose sensitive information about SWRAC, its employees, or the LA to other parties. The only exception to this being when the confidential information gives rise to concerns about the safety or welfare of a student.

Staff members have the right to request access to data that is held about them. Such requests will be made to the Managing Director in writing in accordance with the Data Protection Policy.

Staff will ensure that:

- Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access, and will not be left unattended or in clear view anywhere with general access.
- Implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information.
- Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- They will not use their personal laptops or computers for SWRAC purposes. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- When sending confidential information staff will always check that the recipient is correct before sending.
- They involve the DPO in all data protection matters closely and in a timely manner.

Before sharing data, all staff will ensure:

- They are allowed to share it.

- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from SWRAC premises accepts full responsibility for the security of the data.

When students and staff join SWRAC, the staff member or student (or, where appropriate, student's parent) will be required to complete a consent form for personal data use. This consent form deals with the taking and use of photographs and videos, amongst other things. Where appropriate, third parties may also be required to complete a consent form.

SWRAC holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

20. Probity of records

The deliberate falsification of documents, such as references, academic qualifications, or legal documents, is unacceptable. Where a staff member falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

21. Monitoring and review

This document will be reviewed on an annual basis by the Managing Director , and any changes made will be communicated to all members of staff.

All members of staff are required to familiarise themselves with this document as part of their induction programme.