STAFF CODE OF CONDUCT

Last Review: November 2023	**Constructed/Reviewed by:** Mentone Grammar School on advice from Russell Kennedy Lawyers
Next Review: November 2024 (and every two years thereafter, or more frequently as required).	**Approval Required:** Principal
Policy Number: 9	**Implementation Date:** 30 November 2023

1   Purpose

1.1   At Mentone Grammar (the **School**), our expectations for the way staff conduct themselves is underpinned by:

(a)   the School's values: Caring, Respect, Integrity, Endeavour, Service, Discipline and Resilience;

(b)   the School's purpose and core vision, which is to develop resilient young people with a wide range of skills, interests and attributes to find their place in an ever-changing world, through a leading educational environment which challenges and motivates within a caring community;

(c)   the School's paramount consideration, which is the care, safety and welfare of its students; and

(d)   respect for the School and members of the School community.

1.2   The School encourages staff to adopt positive behaviours and has developed this Staff Code of Conduct to support staff, and protect the interests of the School and its students, by providing clear behavioural guidelines and expectations. The School must enforce certain standards to ensure the success, care, safety and welfare of the School community. Disciplinary action, up to and including termination, form part of the School's response when staff fall short of the School's standards.

1.3   This code ensures that staff understand:

(a)   The general standards of conduct and performance (referred to in this code as '**behaviour**') that are expected from all staff at the School.

(b)   Examples of staff behaviour that falls short of the School's standards.

(c)   The obligations on staff to take responsibility for their own behaviour, both at and outside school, and to work with the School and colleagues cooperatively to achieve a productive, respectful and safe school environment and workplace.

(d)   How the School responds to concerns about staff behaviour.

1.4   This code is not an exhaustive list of the standards that apply to staff in every aspect of a staff member's behaviour. The School has policies, procedures and rules which set out the School's expectations regarding staff behaviour (which continue to apply). Instead, this code sets out general expectations of the standards of behaviour required.

1.5   To the extent of any inconsistency between this code and any of the School's other policies, procedures and rules, the expectations and processes set out in this code shall prevail. In this

respect, this code should be regarded as an overarching summary of the School's expectations and processes regarding staff behaviour. Nothing in this code should be taken to limit the circumstances in respect of which the School may take disciplinary action in respect of a staff member.

1.6   All staff must familiarise themselves with and comply with this code.

1.7   The processes outlined in this code are intended to be practical, non-adversarial and non-legal. This code does not form part of a staff member's contract or terms of employment.

1.8   The School reserves the right to vary, replace or withdraw this code at any time.

2   Scope

2.1   In this code:

(a)   '**Staff**' and '**colleagues**' means employees (whether employed on a permanent, temporary or casual basis), university and work experience students on placement, contractors, and volunteers employed or engaged by the School.

(b)   '**School community**' includes the School's Board, the Principal, staff, students, parents and alumni.

2.2   The code applies at all times, to all staff for the duration of their employment or engagement. The application of this code is not limited to the School's grounds and operating hours. Indeed, this code also extends to situations when staff are:

(a)   On School grounds.

(b)   At any school-related activities and events (including speech nights, parent-teacher interviews, camps, and similar activities or events held by or in connection with the School).

(c)   Representing the School, including when off-campus or in a digital environment.

(d)   Travelling to and from the School, as well as to and from off-site activities or events.

(e)   Wearing School logos or uniform (including staff name badges).

(f)   Upholding the School's or a Teacher's legal duty of care owed to students.

(g)   Otherwise engaging in behaviour which in the reasonable opinion of the School may adversely affect student health and safety, student relationships, staff health and safety, staff-student relationships, perceptions regarding a staff member's professionalism, a staff member's relationships with other members of the School community, or the reputation of the School.

2.3   In some cases, this code will apply to staff interactions with former students.

3   The School's commitment to promoting positive behaviours

3.1   The School is focused on helping staff develop behaviours which contribute positively to the success of the School. Accordingly, **Table 1** sets out behaviours that all staff at the School are expected to 'Do':

DO	
• Conduct themselves at all times, both personally and professionally in a manner that upholds the ethos, reputation and values of the School • Carry out their duties in a professional, competent and conscientious manner • Seek opportunities to improve their knowledge and skills, including by participating in relevant professional development, school-related learning activities and staff meetings • Act honestly and in good faith in fulfilling their duties and responsibilities • Ensure that their interactions with others reflect the School's values • Model appropriate behaviour for the School's students • Be collaborative, courteous, respectful and prompt in dealing with other people in the School community (and when otherwise representing the School, whether formally or informally) • Respect the School's property, and the property of other members of the School community • Act in accordance with the School's reporting obligations (including as detailed in the Responding to Student Safety Concerns Policy as well as any obligations which apply to them personally	• Comply with all School codes of conduct, policies, procedures and rules • Act ethically and responsibly • Be accountable for their actions and decisions • Be familiar and comply with any legal, industry or professional requirements that apply to a staff member's duties and responsibilities (including under work health and safety laws) • Perform their duties and responsibilities to the best of their ability and be accountable for their performance • Follow reasonable instructions given by their supervisor or delegate • Comply with the School's lawful and reasonable directions and all legislation applicable to their position • Support the delivery of high quality education to the School's students • Comply with the School's dress code

4 Behaviours that may fall short of our expectations

4.1 As in any school, there are a range of staff behaviours which fall short of the School's standards.

4.2 These include behaviours which:

(a) Are contrary to the DO behaviours set out above.

(b) Are one of the DO NOT behaviours set out in **Table 2** below.

(c) Are contrary to the School's other codes of conduct, policies, procedures and rules.

(d) Are contrary to the School's values.

(e) Are contrary to the expectations set out in a staff member's employment contract or offer of employment.

(f) Are contrary to any legal, industry or professional standards that may apply to a staff member. This includes, in the case of Teachers, the standards set out in the Victorian Teaching Profession's Code of Conduct and Ethics.

(g) Otherwise pose risk to the care, safety and welfare of a member of the School community.

DO NOT	
- Act contrary to the expectations outlined in: **Table 1 – 'DO' behaviours** **The Schedules** - Engage in disrespectful, rude or insulting behaviour (including but not limited to sarcasm, derogatory remarks, inappropriate familiarity, behaviour that is passive aggressive, threatening or intimidating behaviour, or social exclusion) - Access, store, process or transmit any information deemed to be of a threatening, obscene, pornographic, or harassing nature - Misuse School facilities and other physical or financial resources. School resources should not be used for personal use and/or gain.	- Be abusive, derogatory, threatening, intimidating, discriminatory or use disparaging language - Engage in physical abuse or violence - Intimidate or victimise others - Be aggressive, whether through words, conduct or gestures - Engage in bullying, discrimination, sexual harassment, or vilification (or behaviour that is perceived to constitute any of the above) - Engage in any activity that leads to a conflict of interest with the School - Engage in unauthorised use of School supplies, materials, telephones or equipment, particularly for personal purposes, including once approved excessive or unnecessary use

4.3 Section 6 outlines the School's general response to dealing with staff misconduct. In summary, the response process involves: understanding the concerns, investigating, making findings, and determining consequences.

5 Concerns about the practicality of this code

5.1 If a staff member is concerned that compliance with a particular aspect of this code is not practical, or otherwise has questions about this code, the staff member should promptly – and before acting contrary to this code – raise the concern with the Deputy Principal or the Director of People & Culture.

6 Breach of this code

"*The standard you walk by is the standard you accept*."

6.1 Staff are encouraged to be upstanders, as it is no longer appropriate to be a bystander to the unacceptable behaviour of others. It is expected that all staff will promptly report any concerns or information about possible breaches of this code (whether by themselves or colleagues) to their supervisor, Director of People & Culture or the Deputy Principal.

Interim measures

6.2 The School has discretion to implement interim measures it considers appropriate in the circumstances pending the outcome of an investigation (see below) about a staff member's alleged conduct. This may include circumstances where the School forms concerns:

(a)   That a staff member has or may have breached this code (or otherwise, the School's other directions, codes of conduct, policies, procedures, rules or values).

(b)   About the staff member's health and wellbeing.

(c)   About the health and wellbeing of other students or staff.

(d)   Of a nature that the School considers it appropriate to exercise its direction to implement interim measures pending the outcome of any inquiries.

6.3   Interim measures may include (but are not limited to) suspending a staff member with or without pay whilst the School conducts an investigation, and/or providing interim directions.

Investigation

6.4   The School will investigate breaches of this code in accordance with principles of procedural fairness. In the context of this code, procedural fairness primarily means affording a staff member an opportunity to respond before a decision is made about the outcome.

6.5   Where concerns about a possible breach of this code arise, the School expects the staff member concerned to demonstrate a commitment to the School's standards and values by displaying confidentiality, cooperation, accountability, insight and transparency.

6.6   After completing enquiries and considering the available information, the School is responsible for determining when conduct of a staff member falls short of the School's standards, and warrants consequences. The final decision regarding such matters rests with the Principal or their delegate.

6.7   Where inconsistent accounts from investigation participants are received, the School will endeavour to resolve these. Nonetheless, it is open for the School to make findings in "*he said/she said/they said scenarios*" on the basis of the information available.

Consequences

6.8   When a staff member's conduct falls short of the School's expectations, consequences will usually include disciplinary action (which may involve counselling, additional training, a warning or termination of employment).

6.9   The nature of the consequences will depend on the nature and seriousness of the conduct, and any other relevant considerations (including whether the conduct is isolated or repeated, the context in which the conduct occurred, and the consequences and risks created by the conduct). Ultimately, any consequences which involve a staff member's ongoing employment require that there remain trust and confidence in a staff member's capacity and willingness to uphold the standards outlined in this code.

6.10   The final decision regarding consequences rests with the Principal or their delegate.

7   Communication and Implementation

7.1   This code is available to staff as part of the School's internal policies and procedures. Aspects of (and updates to) this code will be addressed in the School's professional development updates, training programs, briefings and bulletins.

7.2   To properly implement this code:

(a)   The School will review this code as part of the School's regular review cycle (or more frequently, including in response to legislative amendments, an incident, changes to the School's internal procedures or practices, or otherwise as requested by the Principal).

(b)   Periodic training and refresher sessions on this code are provided to all staff.

(c)   All staff must ensure that they abide by this code and assist the School in implementing the code.

SCHEDULES

SCHEDULE 1: Student Safety

SCHEDULE 2: Professional Boundaries

SCHEDULE 3: Duty of Care and Work Health and Safety

SCHEDULE 4: Alcohol, Drugs and Illicit Substances

SCHEDULE 5: ICT Resources and Social Media

SCHEDULE 6: Dress and Appearance Standards

SCHEDULE 7: Conflicts of Interest, Gifts, Benefits and Bribes

SCHEDULE 8: Communications, Media, Privacy and Confidentiality

Relevant codes of conduct, policies, procedures and rules include:

- Respectful Workplace Policy

- Grievance Policy (Staff)

- Conflict of Interest Declaration Form

- Student Safety & Protection Policy

- Student Safety Recruitment and Selection Policy

- Responding to Student Safety Concerns Policy

- Student Safety Staff Code of Conduct

SCHEDULE 1: STUDENT SAFETY

1   Introduction

(a)   This Schedule operates as a code for the purposes of the Child Safe Standards and should be read in accordance with the School's *Student Safety & Protection Policy*.

2   Commitment to student safety

2.1   The School is committed to protecting its students from all aspects of harm and has established strategies, practices, policies and procedures to uphold its public commitment to student safety and wellbeing.

2.2   The School takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing (including child abuse). Accordingly, this Schedule:

(a)   While not an exhaustive list, it clearly establishes a list of acceptable and unacceptable behaviours by members of the School community towards our students, with the ultimate aim of protecting such students from harm.

(b)   Offers guidance to School staff and informs them of considerations relevant to personal, professional and ethical decision making.

(c)   Serves to protect our students, reduce any opportunities for abuse or harm to occur, and promote student safety and wellbeing in our School environment.

(d)   Provides guidance on how to best support students and how to avoid or better manage difficult situations.

3   Student protection

3.1   Specifically, staff will:

DO
• Behave as a positive role model to students, including through words, conduct and actions.
• Promote the care, safety and welfare of students.
• Provide a learning experience which is consistent with the School's and relevant professional or occupational codes of conduct, which supports students to achieve their personal best, and takes into account individual learning and behavioural needs.
• Act consistently (both in person and in the online environment) with the School's student safety and wellbeing strategies.
• Treat all students and members of the School community with courtesy and respect (including by modelling positive, impartial, professional and respectful behaviour and relationships and acting in a manner that sustains a safe, educational and pastoral environment for students).
• Take all reasonable steps to protect students from harm (examples of which include, but are not limited to bullying, child abuse, discrimination, grooming, sexual harassment, neglect, sexual misconduct, sexual offences, physical violence, reportable conduct and victimisation).
• Be aware of and alert to risk factors related to and indicators of harm in students, and where appropriate, report such risks or indicators to the Principal, a member of the Executive Team, or a Student Safety Officer and the relevant authorities.

- Provide appropriate supervision for students with regards to age, individual needs and the specific environment.

- Ensure, as far as is reasonably practicable, that staff are not alone with students unless it is necessary to fulfil the staff member's duty of care or professional duties.

- Comply with any directions, guidelines, policies, procedures and rules promoted by the School with respect to student safety and wellbeing.

- Respect personal differences (including differences regarding cultures, disability, ethnicity, gender, religion, race, political matters, gender diversity and sexuality) and encourage others to do the same.

- Promote the safety (including physical, social and emotional), participation and empowerment of students with a disability, or whom are vulnerable.

- Promote the cultural safety, participation and empowerment of linguistically and culturally diverse students.

- Promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students to ensure equity is upheld and diverse needs are respected (for example, by never questioning their self-identification and by recognising the importance of such students' relationships with their extended family and community, including Elders).

- Inform and empower all students about their rights, including in relation to safety, information and participation.

- In an online environment, identify and mitigate risks while ensuring students' rights to privacy, access to information, social connections and learning opportunities are upheld.

- Use positive and affirming language toward students.

- Recognise that some students need extra care, and provide those students with support, advocacy or skills for the students to advocate for themselves.

- Encourage students to 'have a say' and participate, then listen to them with respect. In particular, listen and respond to the views and concerns of students, particularly if they are telling you that they or another student has been abused (or that they are worried about their safety or the safety of another student).

- Encourage and support students who raise safety concerns (including about actual and suspected child abuse or reportable conduct).

- Seek input from families in relation to decisions impacting students, and act to reduce barriers to inclusion taking into account the diverse needs of students and their families.

- Respect cultural, religious and political differences, and encourage others to do the same.

- Help provide an open, safe and supportive environment for all students to interact, and socialise.

- Intervene when students are engaging in inappropriate behaviours towards each other, or towards others.

- Be aware of and alert to the risk factors of behaviour in breach of this code or that otherwise pose harm to students, and promptly report such concerns to the School.

- Where an allegation of child abuse or reportable conduct is made, ensure (as far as it is

quickly and reasonably possible) that the student(s) involved are safe.

- Call the Police on 000 if you have immediate concerns for a student's safety.

- Respect the privacy of others by not sharing personal information about a student (including any information that could be used to identify a student) unless necessary for their safety or to promote their wellbeing and educational experience. Where it is necessary to share personal information about a student, only do so in an environment where it will be treated confidentially.

- Understand and comply with the School's recordkeeping obligations.

3.2   However, staff must not:

DO NOT
• Engage in any form of inappropriate behaviour towards students (including by engaging in bullying, child abuse, discrimination, grooming, sexual harassment, victimisation, neglect, sexual misconduct, sexual offences, physical violence, reportable conduct or victimisation) or expose students to such behaviour.
• Create a circumstance that places a student at risk of the behaviour described above (for example, by locking doors).
• Use physical means or corporal punishment to discipline or control a student.
• Engage in any form of behaviour that has the potential to cause a student serious or significant emotional or psychological harm.
• Use prejudicial, oppressive behaviour or inappropriate language with or in the presence of students.
• Promote personal views on cultures, disability, ethnicity, gender, religion, race, politics, gender diversity or sexuality in the presence of students (unless a valid professional context arises) or discriminate against any student based on such matters.
• Engage in open discussions of a mature or adult nature (such as those that are not professional or age appropriate, or which otherwise involve a staff member's personal views or personal life) in the presence of students without a valid professional context.
• Take, publish or disseminate (including online) photos, movies, videos or recordings of a student without parent consent.
• Use inappropriate language, jokes or gestures in the presence of students.
• Post online any information about a student that may identify them such as their: name, age, email address, telephone number, residence, school, or details of any association, club or group they may be affiliated with.
• Ignore or disregard student safety and wellbeing concerns (including allegations of actual or suspected child abuse of reportable conduct).
• Consume alcohol in the presence of students, unless at an official School function at which alcohol consumption by staff has been approved by the Principal or the Deputy Principal.

4   **Responding to student safety concerns**

4.1   Staff are required to comply with their reporting obligations under law and under any applicable School procedures (including the Responding to Student Safety Concerns Policy).

4.2   If no specific reporting procedure is specified for a certain issue, staff must:

      (a)   Where an allegation of child abuse is made: ensure as quickly as possible that the student involved is safe.

      (b)   If staff have immediate concerns for a student's safety; call the Police on 000.

      (c)   Report any actual, alleged or suspected reportable or unlawful conduct, breach of any School code of conduct, direction, policy, procedure, or rule, or any other student safety concern to a Deputy Principal or the Principal.

4.3   It is not acceptable, or consistent with the School's values, for staff to not report an issue simply because they were not directly involved (or because they only became aware of an issue outside the course of their employment with the School). Every member of staff has a role to play in ensuring that the School's standards are upheld.

5   **Mandatory notifications**

5.1   Staff must notify the Principal if:

      (a)   they are charged with or convicted of any offence or become aware that another staff member has been charged or convicted with any offence;

      (b)   they are the subject of an allegation, investigation or concern that may impact upon their eligibility to hold a Working With Children Check (or equivalent) or valid teaching registration;

      (c)   they are the subject of a personal safety intervention order (or equivalent) or any other family violence intervention order issued by a court of competent jurisdiction; or

      (d)   through their employment with the School, the staff member becomes aware of any crime involving theft, violence or a sexual offence committed by a person.

SCHEDULE 2: PROFESSIONAL BOUNDARIES

1   Introduction

(a)   This Schedule should be read in accordance with the School's *Student Safety & Protection Policy*.

1.2   Staff must act professionally, including by maintaining professional boundaries, at all times when interacting with students. The relationship between a staff member and a student is not equal. Teachers in particular are in a unique position of trust, care, authority and influence with students, which means that there is always an inherent power imbalance between a Teacher and the School's students.

1.3   It is not possible for the School to definitively identify all possible circumstances in which a staff member may cross professional boundaries. Accordingly, this Schedule is designed to make certain expectations clear, and otherwise provide guidance and raise awareness about certain issues and situations where professional boundaries may be crossed.

1.4   There is no definitive source on where professional boundaries are in relation to interactions between staff and students. Behaviour may cross professional boundaries because:

(a)   It constitutes an actual abuse of a staff member's position of trust and authority over a student (e.g. child abuse and grooming).

(b)   It involves the creation or perception of a personal or 'special' relationship between a staff member and a student (e.g. giving gifts or providing preferential treatment).

(c)   It creates a situation whereby a student is more susceptible to inappropriate behaviour by others (e.g. asking students to keep secrets).

(d)   It was unnecessary as part of a staff member's professional duties.

(e)   It was contrary to the School's codes of conduct, policies, procedures and rules.

(f)   It was contrary to community standards.

1.5   In this regard, staff need to understand that behaviour may cross professional boundaries even if there is no romantic or sexual element to it.

1.6   Some conduct (e.g. child abuse and grooming) is obviously unacceptable. In other cases, staff must take personal responsibility (and will be held accountable) for exercising professional judgment to ensure that appropriate boundaries are maintained, and that all interactions have a valid professional context. At all times, staff must err on the side of caution in deciding whether certain behaviour may cross professional boundaries.

1.7   This means that staff must:

(a)   exercise good judgment;

(b)   consider carefully the implications and potential consequences and risks of certain actions; and

(c)   prioritise a student's own needs (including education, safety and welfare).

1.8   There may be limited circumstances where behaviours discouraged in this Schedule may be undertaken for legitimate and laudable reasons. For example, a staff member may wish to provide money to buy groceries for a disadvantaged student. However, a key theme of professional boundaries is ensuring that any behaviour which may raise questions is as transparent as possible (e.g. with Principal approval).

1.9   Questions which staff may wish to ask themselves when deciding whether certain interactions with a student is appropriate, or perhaps warrants a discussion with the School leadership, include:

(a)   Do the School's codes of conduct, policies, procedures and rules have anything to say about my behaviour?

(b)   Am I dealing with a particular student differently from the way I deal with other students under the same circumstances?

(c)   Would I be acting primarily for the student's benefit, or my own?

(d)   Would I engage in the same behaviour if the Principal was present?

(e)   Is it possible that my behaviour may be perceived negatively by others?

2   Be vigilant.

2.1   Staff must not:

(a)   Engage in conduct that shows, or that can be interpreted as showing, a personal rather than a professional interest in a student.

(b)   Encourage or maintain a personal rather than professional relationship with any student.

(c)   Hold conversations with a student of an intimately personal nature where they disclose information about themselves.

(d)   Engage in sensitive conversations with students. In saying this, staff may, as part of their pastoral care role, sometimes be required to engage in sensitive discussions with students. However, staff must be extremely cautious about making personal comments about a student or asking questions that probe a student's sexuality or relationships.

(e)   Give gifts or other benefits (whether monetary or non-monetary) to students.

(f)   Invite students to their home.

(g)   Visit students at their home.

(h)   Attend parties or socialise with students (noting exceptions arise for staff with children enrolled as students at the School).

(i)   With the exception of those specifically engaged by the School as tutors or coaches, engage in tutoring or coaching students from the School.

2.2   Staff can maintain professional boundaries by:

(a)   Promoting the care, safety and welfare of students.

(b)   Not making physical contact with students without a necessary and valid professional context (e.g. to protect a student from imminent harm).

(c)   Ensuring all communications with students has a valid professional context, and occurs via authorised School channels.

(d)   Not being alone with students unless it is necessary to fulfil a staff member's duty of care or professional duties.

(e)   Not holding conversations with a student of an unnecessarily personal nature (including those relating to sexuality or a student's relationships).

(f)   Not unnecessarily sharing personal information with students.

(g)   Not sharing food with students.

(h)   Not engaging in any behaviour which may pose a risk to the care, safety and welfare of students (including bullying, child abuse, discrimination, emotional or psychological harm, physical violence, sexual harassment and sexual misconduct).

3   Relationships with students

3.1   Staff must not encourage, engage in or maintain a romantic, sexual or overly personal relationship with a student. It is irrelevant whether the relationship is with a student over the age of 18 years, is consensual or non-consensual, or is condoned by parents or caregivers.

3.2   It is also important to note that a professional boundaries issue may arise if a staff member has a romantic, sexual or overly personal relationship with a former student. Relationships formed during a student's enrolment at the School can create a power imbalance that may continue for a number of years. At the very least, a staff member must not have a relationship of any kind with a former student within two years after they have left the School (regardless of their age).

3.3   Staff are reminded that:

(a)   the law prohibits sexual relations with a person under the age of consent (16 years); and

(b)   the law prohibits sexual relations between a teacher and their student under the age of 17 years.

3.4   Staff must also not engage in grooming or other forms of sexual abuse or reportable conduct.

3.5   Should staff form concerns that a student is being overly familiar, seeking to establish a relationship or has a crush on them, that staff member must report their concerns to their supervisor and/or the Principal as soon as possible so that a plan can be established to manage the situation effectively and sensitively.

4 Meeting with students

4.1 Staff should only meet with students for valid work-related purposes (such as counselling or meeting a student on an ad hoc basis to help them with assessments or other school-related issues), and only to the extent that it is necessary to achieve that purpose.

4.2 One-on-one meetings should generally only occur where it is not practicable for another staff member to be present (e.g. counselling sessions). Staff should otherwise avoid situations where they are alone in an enclosed space (e.g. in a room with a closed door) with a student.

4.3 If staff are meeting or having a private conversation with a single student, then staff should:

(a) Hold the meeting at school, during normal school hours and, wherever possible, generally only in settings where other people are also present in the general area or able to observe the meeting (unless this is not practicable due to the inherent nature of the meeting, for example, a counselling session).

(b) Consider the time and venue carefully to ensure the safety of the student is not compromised, and avoid compromising the staff member and the School.

(c) Ensure that the door is left open where possible.

(d) Avoid locating themselves between the student and the door.

4.4 If there are issues complying with the above, staff should notify their supervisor, Head of Campus, Deputy Principal and / or Director of People & Culture or the Principal (preferably before the meeting takes place).

5 Transporting students

5.1 Staff must not drive a student in their private vehicle unless they have specific permission from the School to do so. In the event of an emergency, staff should exercise discretion (for example, by ensuring that a student sits in the back seat of the vehicle) and subsequently report the matter to their supervisor.

6 Confiscation of student property

6.1 Students and their belongings should only be searched in the presence of two staff members, with the knowledge of the Principal or a Deputy Principal (unless a staff member is acting urgently to address a reasonable concern about a serious risk to a student or colleague's health and safety), and in accordance with the School's student behaviour management policies and procedures.

6.2 When confiscating personal items, such as mobile phones or hats, staff should ask the student to hand the items to them. Staff should only forcibly take items directly from students in circumstances where the staff member is reasonably concerned about a serious risk to a student or colleague's health and safety.

7 Physical contact with students

7.1 Staff must not impose corporal or physical punishment on a student, or engage in physical violence.

7.2 Staff should minimise physical contact with students and avoid any unnecessary contact. When physical contact with a student is a necessary part of the teaching/learning experience, or to

protect a student or others from imminent harm, staff must exercise caution to ensure that the contact is appropriate and necessary.

7.3   Physical contact of a limited duration and respectful nature that would generally be acceptable between acquaintances (e.g. high-fiving; shaking hands; contact (with consent) with a valid professional context, for the purpose of demonstrating a technique – for example in relation to sport, music or drama) may occur. However, staff must refrain from engaging in physical contact with students if there is a chance that it may be perceived as inappropriate by the student or other people.

7.4   Under no circumstances should a staff member have physical contact with a student which:

(a)   involves contact with a student's genitals or private areas;

(b)   could be perceived as romantic or sexual (e.g. touching hair, tickling); or

(c)   could be perceived as overly physical (e.g. wrestling, horseplay).

7.5   If a student withdraws consent to physical contact (either verbally or by their conduct, e.g. pushing the staff member away), then the staff member should refrain from any further contact.

7.6   If a staff member is required to touch a student in the course of assessing them for injury or illness, the staff member must advise the student prior to instigating contact and seek (where practicable) the student's consent. Staff should not perform medical assessments on students unless they are qualified and authorised by the School to do so.

7.7   If staff are required to restrain a student from self-harm, or harm to others, any reasonable force used must be in accordance with the School's student behaviour management policies and procedures, or a student's individual management plan. Such incidents must be reported to the Principal or Deputy Principal .

7.8   If inadvertent physical contact occurs, and this is significant contact or may involve contact between a staff member and a private part of a student's body (e.g. chest, groin, buttocks), a file note should be promptly made and forwarded to the Principal.

7.9   Staff should exercise caution when attending to the toileting needs of young children or students with a disability, and ensure that the door remains open where it is appropriate. Where a student requires assistance with toileting due to disability, staff should act in accordance with the student's individual management plan.

8   Electronic and private communications with students

8.1   Staff must only communicate with students through School channels (i.e. using the School's own email addresses, systems and devices), except where the School has expressly approved otherwise.

8.2   Communications with students must always have a valid professional context and use appropriate and professional language. Staff should be particularly careful about the use of emojis; for example, including 'eggplant' and 'love heart' emojis in emails to students would be unacceptable.

8.3   Staff should only communicate with students during normal school hours, except where it is not practical to do so.

For example: Sending an email to a student's school email address at night simply attaching assessment results is acceptable. However, sending an email to a student about non-school

matters outside school hours, or to a student's private email address, or other social media forum, is not acceptable. Similarly, staff should refrain from engaging in back-and-forth emails with students outside school hours, when the discussion could wait until the following day.

8.4 Staff must not invite students to join their personal electronic social networking site or otherwise engage with students on social media except through authorised channels (e.g. on the School Facebook page, or where the use of social media for a valid work-related purpose has been approved by the School).

8.5 Teachers who have been given permission by the School to integrate social media into their professional practice, must ensure that any personal content associated with staff member's account is not accessible to students.

8.6 Staff must only use students' personal contact details for valid work-related purposes.

8.7 Staff must not give out their personal telephone numbers or contact details (including social media contact details) to students, except where the School has expressly approved otherwise.

8.8 Staff must not view a student's social media page or platform (except where this is necessary as part of the School's disciplinary procedures, or the School has expressly approved otherwise), nor should they connect, interact or correspond with students on social media (regardless of who initiated the contact).

9 Photography and video recordings of students

(a) School photography and video recordings, including photographs of students, are only allowed in accordance with permission, including from the Principal or their delegate.

10 Staff are entitled to personal lives.

10.1 The School recognises that many staff have children of their own, and in any case will socialise with other adults who may have children, who are enrolled as students. Such staff will have legitimate reasons for socialising around, and on occasion with, those students.

10.2 This Schedule is not intended to interfere with a staff member's right to a private life or to provide socialisation with friends and family. However, working at the School requires a serious commitment to student safety. Furthermore, Teachers are always in a position of trust and authority with their students, whether they are interacting with the students in or outside the school setting.

10.3 Accordingly, in all aspects staff are expected to conduct themselves in a way consistent with this Schedule, including by avoiding in private and social situations (including on social media) behaviour which could be perceived as contrary to this code or involving a risk to student safety.

10.4 For example:

(a) A staff member's interaction with a student in the course of carrying out their duties and responsibilities to the School should always strictly comply with this code.

(b) Staff should refrain from transporting students other than their own to and from work, or during the workday, even if they are friends with the student's parents. Where this is likely to occur frequently, permission should be obtained from the staff member's supervisor.

(c) Social contact with a student, who is not a family member, should arise from a social relationship with the student's parents (rather than from a social relationship with the student directly). Staff should avoid being alone with a student in these situations, or communicating electronically or online with a student, without the parents' knowledge and consent.

(d) Staff should conduct themselves in a way that will not give others reason to question whether they are crossing professional boundaries with a student.

(e) Teachers should notify the Principal if they become aware they are teaching a relative, or child of a close friend or romantic/sexual partner. This is necessary to enable the School to manage any conflicts of interest which may arise and is not necessarily a reflection on the staff member's professionalism.

(f) Children of staff members may only be in the staff room if it is outside normal work hours (e.g. dinner time for when a function is on).

(g) Children of staff members should not be in shared staff offices.

11 Managing a concern that your actions may have crossed professional boundaries.

11.1 Staff should report to their supervisor or the Principal any concern that their own behaviour, the behaviour of a student towards that staff member, or the behaviour of another staff member, has (or may have) crossed professional boundaries as soon as possible so that a plan can be developed to manage the situation appropriately. This includes, for example, situations where a staff member is concerned that a colleague may be too close to one student (irrespective of whether there is any 'evidence' of a romantic or sexual relationship).

11.2 If a student instigates conduct that crosses professional boundaries, staff must make clear to the student that the conduct is inappropriate. If the student continues to engage in such conduct, staff should remove themselves from the situation once they have made sure that doing so will not pose a safety risk to the student (e.g. if the student would otherwise be left unsupervised).

SCHEDULE 3: DUTY OF CARE AND WORK HEALTH AND SAFETY

1   Duty of care

1.1   The School and its Teachers have a legal duty of care towards the students of the School.

1.2   The School has a legal duty of care to students while they are involved in School activities, or present for the purposes of being involved in School activities.

1.3   This duty extends to taking:

(a)   Reasonable measures, with regard to all the circumstances, to protect students from risks of harm and injury that should have been reasonably foreseen.

(b)   Reasonable care that any student (and other person) on the School's premises will not be injured or damaged by reason of the state of the premises or of things done or omitted to be done in relation to the premises.

1.4   This requires not only protection from known hazards, but also protection from harm that could foreseeably arise and against which preventative measures can be reasonably taken.

1.5   Teachers owe a special duty of care toward students. The standard of care required is that of a 'reasonable' teacher. This means that the duty of care owed is the duty one would expect from a hypothetical teacher with normal skills and attributes exercising their professional judgment. The duty owed to students is not an absolute duty to ensure that no harm will ever occur, but a duty to take reasonable care to avoid foreseeable harm being suffered.

1.6   All staff must behave in a way that is consistent with the School's duty of care to students. Staff must ensure that their own duty of care towards students is also duly discharged.

1.7   Examples of ways in which the School's duty of care is discharged includes (but is not limited to):

(a)   The provision of adequate supervision.

(b)   Ensuring grounds, premises and equipment are safe for students' use.

(c)   Implementing strategies to prevent bullying, child abuse, discrimination, sexual harassment and vilification from occurring in the School.

(d)   Providing medical assistance (if competent to do so) or seeking assistance from a medically trained person to aid a student who is injured or becomes sick at School.

1.8   Staff should exercise professional judgment in ensuring that the standard of care provided is appropriate in the context of the qualifications, skills and expertise of the staff member, and also maturity and ability of the relevant student(s).

2   Work Health and Safety

2.1   Staff must comply with their obligations under work health and safety laws. Please refer to the School's Occupational Health and Safety Policy for further information.

2.2   Staff are expected to complete mandatory compliance training on this topic.

3   Bullying, discrimination, sexual harassment and victimisation

3.1   The School does not tolerate bullying or unlawful discrimination, sexual harassment and victimisation. Please refer to the School's Respectful Workplace Policy and Occupational Health and Safety Policy for further information.

3.2   Staff are expected to complete mandatory compliance training on this topic.

SCHEDULE 4: ALCOHOL, DRUGS AND ILLICIT SUBSTANCES

1   Use of Alcohol, Drugs and Tobacco

1.1   In this Schedule, '**drugs and alcohol**' includes tobacco, cigarettes or e-cigarettes, personal vaping devices (regardless of whether they contain nicotine), drugs and alcoholic substances (including any beverage or product with a labelled percentage of alcohol measurement), and any other illegal, illicit or harmful substances, and related paraphernalia.

Smoking

1.2   The School is a smoke-free environment. Smoking by staff is not permitted at the School (or any School-related activity or event), in School vehicles, or when performing School-related duties and responsibilities (including outside of the School premises, when wearing School attire, or representing the School).

Alcohol

1.3   Alcoholic substances may only be served or consumed at the School (or any School-related activity or event) with the Principal or a Deputy Principal's prior approval. Such approval is subject to the responsible consumption and service of alcohol.

1.4   In any case, staff are required to have a blood alcohol level of 0.0, and not be under the influence of alcoholic substances, during school hours, when in School vehicles, or when performing School-related duties and responsibilities (including where a staff member has a continuing responsibility for students, such as during camps and excursions).

Over the counter and prescription medication

1.5   Staff must ensure that their capacity to perform their School-related duties and responsibilities is not impaired by the use of over-the-counter prescription medication in line with medical advice, and that the use of these and other substances does not put at risk any person's health and safety.

1.6   Staff must promptly notify a supervisor if aware that the staff member's conduct or work performance may be adversely affected by over-the-counter prescription medication.

Drugs and alcohol generally

1.7   Staff must otherwise:

(a)   Not use or be under the influence of drugs and alcohol when attending the School (or a School-related activity or event), when in School vehicles, or when performing School-related duties and responsibilities (including where a staff member has a continuing responsibility for students, such as during camps and excursions).

(b)   Not bring onto School grounds (or to any School-related activity or event), possess, sell or supply drugs and alcohol.

(c)   Not condone, encourage or facilitate students bringing onto School grounds (or to any School-related activity or event), possessing, selling or supplying drugs and alcohol.

(d)   Not sell or supply drugs or alcohol to students. Nothing in this sentence is intended to limit a staff member's ability to provide first aid to a student, or otherwise provide or administer students with medication in accordance with the First Aid Policies, or as otherwise approved by their parents.

(e)   Notify a supervisor and People & Culture if concerned that another staff member may be affected by drugs and alcohol.

1.8   If the Principal or a Deputy Principal holds a reasonable belief that a staff member has acted in breach of the above requirements, the School reserves the right to:

(a)   Require that staff member to take an immediate drug/breathalyser test.

(b)   Inspect the staff member's bag, desk, locker or other belongings.

Failure to comply with this lawful and reasonable direction may result in summary dismissal.

SCHEDULE 5: ICT RESOURCES AND SOCIAL MEDIA

1 **Use of ICT Resources**

1.1 The School provides ICT resources of a high quality to maximise teaching and the educational experience. It is also used for administrative purposes and data storage, transmission and collection.

1.2 ICT resources include, but are not limited to: internet, email, instant messaging, voicemail, social media, scan, all School-supplied computers and software, digital cameras, mobile phones, tablets, USB memory sticks and other storage devices, and associated resources and facilities.

1.3 Anyone with access to the School's ICT resources must comply with the rules and expectations set out in the Staff Code of Conduct (including this Schedule) and the School's Information Security Manual.

2 **Etiquette**

2.1 Electronic communication is rapidly replacing written communication as a primary means of communication. As such, care should be taken to ensure that the content, form, grammar and spelling of all electronic communications meets the professional standards of the School.

2.2 Staff must exercise caution and diligence in the transmission of messages. Electronic communication should not be used to send any message the author would not want viewed by an outside party. Staff must also be conscious of their obligations under the School's other policies and procedures regarding the appropriate use of the School's ICT resources (including the Information Security Manual).

3 **Unauthorised Use**

3.1 Staff must not use the School's ICT resources (including networks and any personal devices that may be connected to these networks) to communicate, create, transmit, store, view, access, upload, download or circulate any of the following materials:

(a) Cyberbullying.

(b) Online gambling.

(c) Sexually related or pornographic messages or material.

(d) Violent or hate-related messages or material.

(e) Racist or other offensive messages.

(f) Materials that harass, discriminate against, intimidate, threaten or offend.

(g) Malicious, obscene, libellous or slanderous messages or material.

(h) Software that is not licensed by the School.

(i) Executable files without authorisation from the Director of ICT (or their delegate).

(j) Virus, caches or content that otherwise compromises the School's cybersecurity.

(k) Subversive or any other messages or material related to illicit or illegal activities.

(l) Materials and/ or messages that reflects negatively on the School.

(m) Highly sensitive material or proprietary information.

(n)   That otherwise contravenes this policy, the Information Security Manual and any other policy of the School.

3.2   Staff must also not engage in unauthorised use of School supplies, materials, electronic equipment (e.g. telephones, network, computers, iPads). In addition to those matters outlined earlier in this clause 3, unauthorised use includes excessive and unnecessary use.

3.3   All ICT resources (including communication systems) must be used for legitimate purposes. ICT resources must not be used for commercial/business communications/transactions unless they are authorised by the School. Personal usage does not include any usage for any business, organisation or commercial purpose.

4   Information classification

4.1   Staff must follow the requirements for information management, specifically data classification and handling requirements set out in the Information Security Manual.

5   Monitoring and Consequences

5.1   The School reserves the right to monitor, traffic and review all content sent and received on its systems. Breaches of acceptable usage of ICT resources will result in disciplinary action.

5.2   Any actual or suspected breach of the School's ICT resources must be reported to the Director of ICT without delay.

6   Social Media and Networking

6.1   Social media and social network has become an integral part of society, but is an area where a number of issues and risks arise. The School requires employees to take great care in order to act in the best interests of the School when participating in social media.

6.2   Social media includes social media networks (such as but not limited to Facebook, Twitter, Snapchat, LinkedIn, WhatsApp and MySpace), video/photo sharing sites (such as but not limited to YouTube, Instagram and TikTok), chat rooms, video chat (such as but not limited to Skype, Microsoft Teams and Zoom), online forums and discussion groups, wikis, blogs, micro-blogging tools (such as but not limited to Tumblr) and any other website that facilitates the:

(a)   publishing of user generated content and opinion (such as traditional media news websites);

(b)   opportunity to connect with others online;

(c)   creation and sharing information and ideas; and

(d)   development of relationships and networks.

7   Use of the School's social media, electronic communication and information resources

7.1   Staff must not use the School's ICT resources to access social media, unless they have prior permission from their supervisor and access is for:

(a)   teaching;

(b)   pastoral care within the School's pastoral care framework; or

(c)   educational purposes.

7.2   Further information about the responsibilities of staff can be found in the Information Security Manual.

8   **Communications with current students and current parents**

8.1   Staff must not use social media to connect or communicate with current students and current parents unless they have prior permission from their supervisor and communication is for:

(a)   teaching;

(b)   pastoral care within the School's pastoral care framework; or

(c)   educational purposes.

9   **Communications with former students and former parents**

9.1   Staff are advised that there should be no unauthorised contact with former parents and students and should seek guidance from the School as appropriate for approval before communicating with alumni on social media.

9.2   In this regard, a staff member's professional obligations to the School (and for teachers, registration) may be compromised if the staff member has a personal, romantic or sexual relationship with a former student. This extends to any former student – and particularly, those former students who are either under the age of 18 or have completed their senior secondary schooling within the past two years.

10   **File sharing and disclosure of confidential and/or sensitive information**

10.1   Staff must not, under any circumstances, disclose or refer to any information through social media that relates to the School, students or colleagues that is confidential, proprietary or privileged.

10.2   All filesharing (including internal and external collaboration) must accord with the School's policies and be within approved applications.

10.3   Filesharing links must be used in place of email attachments wherever possible.

11   **Password requirements**

11.1   The School requires its ICT devices and network to be password protected.

11.2   The School has the following password requirements:

(a)   Do not re-use the same password for multiple systems.

(b)   Passwords must have a minimum of fourteen (14) characters.

(c)   Passwords should not contain easily guessed information such as:

(1)   Name, telephone number, date of birth, Mentone Grammar products or services.

(2)   Combinations of years, months, cities, seasons.

(d)   Passwords must only be stored in School provided password managers (Bitwarden and Edge).

12   **Abuse, disparagement, bullying and harassment over social media**

12.1 Staff must not, on social media:

(a) abuse, defame, disparage or speak disrespectfully about the School or members of the School community; or

(b) bully, harass or make discriminatory remarks about members of the School community.

12.2 Staff should refer to the Respectful Workplace Policy and consult with the Director of People & Culture and/or Student Safety Officer for further guidance.

13 **Communicating on behalf of the School**

13.1 Staff must not speak on behalf of the School, or imply that they are speaking on behalf of the School, on social media.

13.2 In some circumstances, the Principal may give authorisation for a staff member to speak on behalf of the School. In such circumstances, prior written authorisation of the Principal is required.

14 **Privacy settings, device and network security**

14.1 Staff are reminded that they should not have any expectation of privacy on social media. Even if it is intended that content be private, it may unintentionally enter the public domain and be viewed by colleagues, the media, students and families of students.

14.2 Inappropriate content and information on social media, which is capable of being connected with the School, may adversely affect the School, a student or a colleague.

14.3 The School's ICT network is subject to security settings. Staff must not alter or remove security controls such as anti-malware software on School devices.

SCHEDULE 6: DRESS AND APPEARANCE STANDARDS

1   Dress and appearance standards

1.1   Staff must dress professionally and in a manner which allows them to perform their duties safely and comfortably, whilst at the same time fitting in with the expectations of the School community.

1.2   Staff must not:

   (a)   Dress in a manner that conflicts with the School's occupational health and safety requirements.

   (b)   Wear ripped or revealing clothing.

   (c)   Wear clothing depicting contentious words and graphics.

   (d)   Expose their midriff.

   (e)   Wear singlets, denim, or strapless tops.

   (f)   Display tattoos or excessive piercings (which must be concealed by clothing, cosmetics or other means).

1.3   All staff members are provided with official identification badges. Staff are encouraged to wear these badges at all times and must wear them when representing the School on official occasions (including School events, excursions and conferences).

1.4   Please refer to the School's Dress Code Policy for further information.

SCHEDULE 7: CONFLICTS OF INTEREST, GIFTS, BENEFITS AND BRIBES

1   Conflict of interest

1.1   Conflict of interest arises in circumstances where an employee's duty to Mentone Grammar is influenced, or can be seen to be influenced, by a private interest. Private interests include both financial and non-financial interests, and can include the interests of family members and close friends or associates. They can be positive or negative interests.

1.2   There will be a conflict of interest where an employee has personal interests that could improperly influence or affect, or be seen to influence or affect, their decisions or actions in the performance of their duties at Mentone Grammar.

1.3   An actual conflict of interest exists where there is a direct conflict between the personal interests of an employee and the interests of Mentone Grammar or the duties the employee owes to Mentone Grammar such that the personal interest could improperly influence or affect their decisions or actions in the performance of their duties.

1.4   A potential conflict of interest exists where it is foreseeable from the circumstances that the personal interests of an employee could affect the interests of Mentone Grammar and/or improperly influence or affect their decisions or actions in the performance of their duties, but there is no current conflict of interest.

1.5   An apparent or perceived conflict of interest exists where the circumstances could reasonably indicate to a reasonable person that the personal interests of an employee could be affecting or influencing their performance of their duty to Mentone Grammar, whether there is an actual conflict or not.

2   Personal interest

2.1   Personal interests may be financial or non-financial, and may also be held in relation to family members, close friends, and associates.

2.2   The fact that a staff member has a relationship (e.g. family, friendship) with someone connected with Mentone Grammar does not necessarily mean there is a conflict of interest. Whether a conflict of interest exists depends on the circumstances.

3   Identifying and managing conflicts of interest

3.1   Staff must not act in conflict with the School's best interests. Any actual, potential or perceived conflict of interest must be reported to the staff member's supervisor or the Principal.

3.2   Where the Principal has a conflict, they should report this to the Board.

3.3   Where a Board member has a conflict, they should report this to the Chairperson and other members of the Board.

3.4   Staff must also report situations where a superior or colleague who has an identified conflict is, or may be perceived as, being unduly influenced.

3.5   Please refer to the School's Conflict of Interest Policy for further information.

4   Declaring gifts, benefits and bribes

4.1   Staff may be offered a gift or benefit as an act of gratitude. There are some circumstances where to refuse a gift would be perceived as rude, insulting or hurtful. Staff are expected to exercise sound judgment when deciding whether to accept a gift or benefit that may exceed the nominal value in this code or otherwise be considered inappropriate.

4.2   This does not apply, for example, to Mentone Grammar or its staff providing a gift to the individual, for example when the individual departs Mentone Grammar, or when the individual is celebrating a milestone such as marriage, childbirth or years of service at Mentone Grammar.

4.3   Staff must not give gifts to students. Any gifts offered by or received from students with more than a token value should be declared to the School.

4.4   A gift with a nominal value of over $200 should not become personal property; it should either be refused or accepted on behalf of the School. If accepted, staff are required to report this to the Director of Business who will keep a record of declarations made in accordance with this Policy.

4.5   Staff must not accept any bribe (i.e. anything given in order to persuade or that may be reasonably perceived as a staff member being persuaded to act improperly or unprofessionally). Staff must report any such incident immediately to the Director of Business or their delegate.

4.6   If a staff member, in the course of their employment, wins a prize of significant monetary value (e.g. a computer or any item with a nominal value of $200 or more) from another organisation, they must advise their Director of Business or the Principal, who will determine how the prize should be treated and recorded.

4.7   Staff must:

- not solicit gifts or benefits;
- not accept offers of gifts or benefits that could reasonably be perceived as undermining the integrity of Mentone Grammar or the individual;
- inform the gift giver that it is enough to say thank you;
- politely decline all offers of gifts or benefits from individuals or organisations about which they are likely to need to make a decision;
- refuse all offers of money or items easily converted to money, such as shares;
- seek advice from the Director of Business if unsure how to respond to an offer of a gift or benefit of more than the set nominal value.
- undertake other employment/paid activities unless authorised by the Principal or their delegate.

4.8   Where staff undertake other employment or paid activities outside of the School, especially when this other activity or employment relates to work duties, there may be an actual, potential or perceived conflict of interest. A conflict of interest may also arise in relation to unpaid activities in which the person has a vested interest that relates to their work duties.

4.9   Approval for other employment and paid outside activities must be sought prior to engaging in such activities, and at all times paid work and unpaid activities which are likely to cause an accrual or potential conflict of interest should be avoided.

5   Procuring goods and services, contract management and tendering

5.1 Staff must avoid conflicts of interest in the process of procuring goods and services, engaging contractors, and tendering for works for the School. This includes where a staff member is involved in the procurement process has an interest or relationship with one or more of the potential suppliers or tenderers.

6 Recruitment

6.1 Where a staff member makes a decision about recruitment, there may be a conflict of interest where that staff member has a current or past professional or personal relationship with a potential recruit, or where they have some other vested interest in the recruitment of a potential recruit. Such situations should be avoided where reasonably possible and the recruitment process must include input from, and approval of the decision by, another staff member at the School who does not have that conflict or potential conflict.

7 Managing conflicts of interest

7.1 Where the Principal considers that there is a potential/perceived/actual conflict of interest involving a staff member other than themself or a Board member, reasonable steps will be taken to avoid or manage the conflict. Any agreed actions or directions should be recorded on the declaration form.

7.2 This may include the Principal preparing a conflict of interest management plan to be discussed with the staff member. In developing the conflict of interest management plan the Principal should consider input from the staff member, but the staff member is obliged to follow the conflict of interest management plan settled by the Principal.

7.3 Where the actual, potential or perceived conflict of interest involves the Principal, the Principal will work with the Board to develop the conflict of interest management plan.

7.4 Where the actual, potential or perceived conflict of interest involves a member of the Board, the Board will develop the conflict of interest management plan.

7.5 The School is committed to and will uphold the following principles in applying this code and developing conflict of interest management plan:

- all staff are accountable for avoiding wherever possible, or identifying, declaring and managing any actual, potential or perceived conflict of interest that applies to them;

- once a conflict of interest has been disclosed this information should be recorded in a register of conflicts;

- where there is a conflict of interest in relation to a particular matter for a particular employee then either:
  - the conflicted individual should remove himself or herself from the matter or be removed from the matter;
  - restrictions should be placed on the conflicted individual's involvement in the matter;
    - this is only a viable option where the conflicted individual can be effectively separated from the relevant parts of the matter without their regular duties being impacted.

   o this will involve, for example, the removal of the conflicted individual from debate or decision-making about the relevant matter, or restricting access to information relating to the matter;

- a non-conflicted third party could be used to oversee part or all of the process in relation to the matter;

- the conflicted individual should relinquish the private interest that creates the conflict of interest; or

   o this will not be possible where, for instance, the conflict is the result of a relationship with a family member, and also may not be suitable where the perceived conflict is low risk; or

- where there is no other option, the conflicted individual should resign from their employment/role.

- the details of the conflict management plan must be recorded.

8 Monitoring conflict of interests

8.1 Once a conflict of interest plan is in place, the conflicted staff member and the Principal or delegate will monitor the conflict of interest.

8.2 If the relevant circumstances change relating to the conflict of interest the conflicted individual should inform the Principal or delegate.

8.3 Where a conflict of interest is ongoing, the Principal or delegate should:

- regularly review the chosen strategy to ensure it remains relevant; and

- keep a formal record of this reassessment.

8.4 Where a conflict of interest relates to the Principal, these procedures should be read as conferring responsibilities on the Board to be informed, monitor, and review.

SCHEDULE 8: COMMUNICATIONS, MEDIA, PRIVACY AND CONFIDENTIALITY

1   Communications

1.1   Staff must ensure that their internal and external communications are courteous, respectful and otherwise appropriate to a professional workplace environment.

1.2   Staff should not disclose information about students or other staff except in the ordinary course of performing one's duties, and then only to people with a need to know.

2   Media enquiries

2.1   All media enquiries must be directed to the Director of Advancement and the Principal in first instance.

2.2   Staff should not allow the media access to students or the School premises without the express permission of the Principal.

2.3   Staff must not make comments to the media about the School or members of the School community without the express permission of the Principal.

3   Confidential information and privacy

3.1   Staff must:

(a)   Only use confidential information for the work-related purpose it was intended and secure it against unauthorised access, use or disclosure.

(b)   Have regard to their confidentiality obligations when in discussions with members of the School community. However, staff must not provide a guarantee of confidentiality if the matter under discussion requires mandatory reporting.

(c)   Treat all matters discussed or actioned in staff meetings and staff memos as confidential.

(d)   Not disclose or use any confidential information without the express permission of the Principal, unless authorised to do so by law.

(e)   Make sure that confidential information, in any form, cannot be accessed by unauthorised people. In this regard, such information should only be provided to people, either within or outside of the School who are authorised to access the information and do so on a needs to know basis.

(f)   Report any actual or suspected unauthorised use of the School's confidential information.

3.2   Staff must handle sensitive and personal information in accordance with the School's *Privacy Policy*.

3.3   Staff should not post online any information about a student that may identify them (such as their full name, age, email address, telephone number, residence, school, or details of a club or group they may attend).

3.4   Staff must not take or publish (including online) photos, movies or recordings of a student without approval and a valid educational context.

4   **Record Keeping**

4.1   Staff must create and maintain full and accurate records of their activities, decisions and business transactions in the course of their employment. Staff must handle records in accordance with the School's Records Retention Policy.

4.2   Supervisors must ensure that the staff reporting to them comply with their records management obligations.

5   **Copyright and Intellectual Property**

5.1   Staff must ensure the intellectual property rights of others are not infringed by their activities and that any third-party copyright/other rights included in materials used for work purposes is documented.

5.2   Advice relating to sharing or licensing the School's intellectual property should be sought from the Director of Business or the Principal.

5.3   Staff cannot give away or assign the School's intellectual property without the approval of the Director of Business or the Principal.

5.4   If staff develop material related to their employment with the School, the copyright in that material will belong to the School. This may apply even if the material was developed in their own time or at home.