Woodchester Endowed Church of England (Aided) Primary School

'Love, Learn and Flourish Together'

Our church school community seeks to inspire children and adults to love, learn and flourish together so we may become everything God has created us to be.

Code of Conduct Policy
September 2023

Written by:	**Lynn Pennington (Headteacher)**
Review date:	**September 2024**
Ratified by Governors:	**September 2023**

Indeed, the body does not consist of one member but of many' (1 Corinthians 12; 14-16)

'Love, Learn and Flourish Together'

Contents:

1.0 Introduction

2.0 Standards

3.0 Personal Appearance

4.0 Use of the School's facilities and equipment

5.0 Fraud and corruption

6.0 Gifts, hospitality and sponsorship

7.0 Register of gifts and hospitality

8.0 Disclosure and use of information

9.0 Political neutrality

10.0 Relationships

11.0 Electronic communications

12.0 Appointments and other employment matters

13.0 Undertaking additional work outside of the school

14.0 Arrest or conviction on civil or criminal charges

15.0 Membership of clubs, societies and other organisations which are not open to the public and/or which have secrecy about rules, membership, etc.

16.0 Conflict of interest

17.0 Equality issues

18.0 Health and safety issues

19.0 Confidential reporting procedure for employees (whistle-blowing)

20.0 Breaches of the code of conduct

Issued by: Human Resources
Reviewed: 09/2022

© Gloucestershire County Council

1.0 Introduction

1.1 This document is a model code which school Governing Boards may choose to adopt. Where the code is adopted, the Governing Board may wish to approve additional guidance after consultation with staff and trade union reps to meet the operational needs of the school.

1.2 The Code applies to School employees regardless of the basis of the employment including:

1.2.1 Secondments (both to and from the School/other schools/ other organisations/County Council)
1.2.2 Temporary assignments, Work Placements and Trainees
1.2.3 Governors
1.2.4 Employees acting as members of companies or voluntary organisations.

1.3 The purpose of this Code is to give all school employees guidance on how the School and the public in general expect them to behave. High standards are expected of all staff working in schools and if the Code is followed then staff should not find themselves in a situation where their conduct could create an impression of conflict of interest or corruption in the minds of the public and colleagues. If staff are unsure of the standards expected of them, guidance should be sought from their Headteacher or, in the case of Headteachers, the Governing Board or the County Council's Director of Education.

1.4 The areas covered by this Code are as follows:

1.4.1 Standards
1.4.2 Personal Appearance
1.4.3 Use of the School's Facilities and Equipment
1.4.4 Fraud and Corruption
1.4.5 Gifts, Hospitality and Sponsorship
1.4.6 Register of Gifts and Hospitality
1.4.7 Disclosure and Use of Information
1.4.8 Political Neutrality
1.4.9 Relationships
1.4.10 Electronic Communication
1.4.11 Appointments and Other Employment Matters
1.4.12 Undertaking Additional Outside Work
1.4.13 Arrest or conviction on civil or criminal charges
1.4.14 Membership of clubs, societies and other organisations
1.4.15 Equality Issues
1.4.16 Health and Safety Issues
1.4.17 Confidential Reporting Procedure (Whistle-blowing)
1.4.18 Breaches of the Code of Conduct.

2.0 Standards

2.1 School employees are expected to give the highest possible standard of service to the students and to support Governors and fellow employees with impartiality. The highest standard of probity must apply and employees must report any suspected unlawfulness, mal-administration, impropriety or breach of procedure of which they are aware to their Headteacher, Chair of Governors or Senior County Council Officer. (See also the School's Whistleblowing Procedure).

2.2 The School, for its part, considers it has a duty to protect employees against unjustified allegations of wrong doing.

2.3 It is expected that employees will report all low level concerns to their line manager/Headteacher. A low level concern is any concern, no matter how small, that an adult working in or on behalf of the school has acted in a way that:

2.3.1 is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
2.3.2 does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

2.4 It is the school's responsibility to create and embed a culture of openness, trust and transparency in which the school's values and behaviours are constantly lived, monitored and reinforced by all employees.

3.0 Personal Appearance

3.1 Although the School has not adopted a formal dress code it does expect employees to observe a standard of personal hygiene and appearance which is appropriate to the nature of the work undertaken.

4.0 Use of the School's facilities and equipment

4.1 The School is entitled to expect at least the same standard of care of its property as employees give to their own property. Any facilities, property or equipment provided by the School should only be used in connection with official duties except where the Headteacher and Governors have agreed to private use. There may be arrangements for the use of some services for private purposes on the payment of approved charges e.g. private telephone calls and photocopies, etc. Employees should always ensure that there is either general or specific agreement to private use of any facility or equipment.

4.2 When an employee ceases working for the School all papers and other records, equipment and any other property of the School must be returned.

5.0 Fraud and corruption

5.1 **Culture of the Organisation**

5.1.1 Although the School believes that Governors, employees and organisations associated with the School will act with honesty and integrity, it recognises that occasionally this will not be the case. The School's culture is one of honesty and zero tolerance in respect of fraud and corruption.

5.1.2 Employees must make themselves aware of and comply with the School's Finance Policy and the Fair Funding Scheme for Financing Schools. In addition, the following useful key documents available from the County Council set out various standards of behaviour and procedures in addition to those mentioned in this Code:

5.1.2.1 Financial Regulations/Accounting Instructions
5.1.2.2 Information Management and Security policies, procedures and standards
5.1.2.3 Standing Orders
5.1.2.4 Procurement Guidance
5.1.2.5 Employee Handbook.

5.1.3 Employees must use public funds entrusted to them in a responsible and lawful manner and ensure that value for money is achieved. They must comply at all times with the School's procedures and be mindful of the Council's Financial Regulations and associated Accounting Instructions.

5.1.4 It is a criminal offence for employees to give or receive any *gift, loan, fee, reward or advantage for doing, or not doing anything, or showing favour or disfavour to any person, company or contractor,

with a corrupt intention. If an allegation is made it is for the employee to demonstrate that any rewards received have not been corruptly obtained. (* see point 6.3.1 relating to gifts of a trivial nature and point 6.6 which relates to the Bribery Act 2010).

5.1.5 Although there may be no corruptive intention in the act of giving or receiving of gifts, etc. it is important to avoid any grounds for suspicion of corruption. For example, where contracts are being negotiated employees should not negotiate with a potential contractor, supplier or purchaser (of land for example) on a one -to- one basis. Employees must ensure that all steps in the contract negotiations should be recorded and that their manager has approved those steps in writing. Standing Orders, Financial Regulations, the Procurement Guidance and the policies of both the School and the Council must always be followed; an adequate audit trail must be maintained.

5.1.6 The School recognises that a key preventative measure in the fight against fraud and corruption is to take effective steps at the recruitment stage to establish the previous record of potential employees in terms of their propriety and integrity. Employees acting under the delegated authority of the Governing Board, when applying the recruitment procedures, should ensure that they are followed in respect of all appointments and that written references are obtained regarding known honesty and integrity. (See also point 13.1).

5.2 **Personal Interests**

5.2.1 Any personal interests, financial or otherwise, must be registered when they could reasonably be deemed to potentially conflict with any work undertaken by employees in the course of their duties. The Headteacher will be responsible for ensuring that their personal interests are registered in accordance with this Code and that all of their employees are aware of the need to register personal interests. In certain circumstances, even though a conflict of interest is not anticipated (e.g. acting as a School Governor, involvement with an organisation receiving grant aid from the Local Authority, involvement with an organisation or pressure group which may seek to influence the Local Authority's policies) employees should register their interests.

5.2.2 Section 117 of the Local Government Act 1972 requires all employees to give written notice of any contract or proposed contract in which the School/Council is involved and in which the employee has a financial interest (either direct or indirect) as soon as the employee becomes aware of it. Failure to declare an interest is a criminal offence and may result in prosecution.

5.2.3 A direct financial interest arises where an employee or their partner, family member or close friend has a financial interest in a contract or proposed contract whether to their advantage or disadvantage, in which the Council is involved. An indirect financial interest may arise where an employee or their nominee or employee's partner holds securities or shares in a company, which exceeds £25,000 or 1/100th of the total share capital of a company which has a direct financial interest, whichever is the lesser amount.

5.2.4 A non-financial interest may occur when an employee or their partner, family member or close friend has membership or association in a company, society, club or other body, trade union or voluntary body, or is employed by another person or company which has direct financial interests in any matter which is the subject of discussions/negotiations with the School/ Council.

5.2.5 Details of interests must be made in writing and sent to the Headteacher or Governing Board who will record it in a register and acknowledge receipt of the declaration (a copy should be retained in the school). Employees should ensure that they receive an acknowledgement back from the Headteacher or Governing Board. The declaration must be made as soon as the employee is aware of the interest and/or the contract or proposed contract to which the interest relates. All contracts or proposed

contracts are covered by this requirement, including contracts for the regular supply of goods and services.

5.2.6 Employees with a financial or non-financial interest in any matter should not only declare that interest but also seek to distance themselves from involvement in that matter. Employees must be open and up front about their interest in all associated dealings. In particular, any such interest must be stated at meetings, whether School/Governor meetings or other meetings, public or private. Notes taken at the time should be placed in the appropriate file concerning the interest(s) and how it has been handled.

5.2.7 Employees involved in the award or management of contracts shall declare in writing to their Headteacher (or in the case of Headteacher the Chair of Governors) any association or friendship with any contractor involved and should take no part in the tender process without their written approval. Any employees engaged in the consideration or determination of any application for any contract, permission, grant, approval or consent must declare to the Headteacher (or in the case of the Headteacher, the Chair of Governors) any association with any person or body who is an applicant in the field of work in which that employee is engaged.

5.2.8 A Headteacher (or in the case of Headteacher the Chair of Governors) to whom any such interest, association or friendship is declared shall consider whether to take steps to ensure the employee concerned is not placed in a position where private interests and official duties may conflict.

5.3 Rules Governing Purchasing by Employees

5.3.1 Employees must follow the School's Finance Policy, the Fair Funding Scheme for Financing Schools and be aware of the Council's Financial Regulations, Standing Orders, (when appropriate) and Accounting Instructions whenever any goods or services are purchased.

5.3.2 Employees may not order, in the name of the School, equipment or goods, whether with a discount or not, from official Council suppliers for their own personal use even if the cost is reimbursed in full to the Council.

5.4 Separation of Roles during Tendering

5.4.1 Employees involved in the tendering process and dealing with contractors should understand the separation of client and contractor roles within the School. Senior employees who have both client and contractor responsibilities must be aware of the need for accountability and openness.

5.4.2 Employees who are privy to confidential information in respect of tenders or costs for either internal or external contractors must not disclose that information to any unauthorised person or organisation or use it for any unauthorised purposes.

5.4.3 Employees should ensure that no special favour is shown to current or recent former employees or their partners, close relatives or associates in awarding contracts to businesses run by them or employing them in a senior or relevant managerial capacity.

5.4.4 Employees must not use their position and knowledge of the School to gain access to and provide information which puts a particular contractor or anyone else in a better position than any other contractor tendering to undertake work or to provide services or supplies.

5.5 Reporting a Concern

5.5.1 "Whistleblowing" by employees of the School is fully supported and encouraged. Where concerns arise these should be brought to the attention of management at all times. If the employee feels they can't tell their employer they should contact a prescribed person/body as detailed on the Government website. In the School's Model Whistleblowing Policy, a procedure is described for employees who wish to report serious concerns relating to any suspicions or allegations of fraud and corruption or any malpractice or maladministration.

6.0 Gifts, hospitality and sponsorship

6.1 Any offers of gifts, hospitality or sponsorship should be recorded in the School's Gifts & Hospitality Register held by each Headteacher or, in the case of Headteachers, the Governing Board. The register must include all offers of gifts, etc. whether accepted or declined. Advice/permission should be sought from the Headteacher or, in the case of Headteachers, the Chair of Governors before any gift, hospitality or sponsorship is accepted. (see point 7.0 below) When in doubt the employee should always refuse such gifts.

6.2 When hospitality or gifts have to be declined, the person making the offer should be informed of the procedures and standards operating within the School, in relation to gifts, hospitality and sponsorship.

6.3 **Gifts (including bequests)**

6.3.1 Gifts offered by persons who are providing, or seeking to provide, goods or services to the School, or who are seeking decisions from the School, should be refused and returned, as should gifts (other than those of a trivial nature e.g. calendars, diaries, desk sets) offered by those receiving services from the school. Gifts, provided they are not of significant monetary value, given for example by pupils or parents to their teachers may be accepted within this code. Also, similar gifts given to teachers during school exchange visits may be acceptable.

6.3.2 In all cases relating to the receipt of gifts it is wise to err on the side of caution: an obviously expensive gift must be tactfully declined or, if appropriate, donated to the School for official use, and the Headteacher or Chair of Governors should be advised of the action taken. If a gift is simply delivered it must be returned to the donor or, if appropriate, be donated to the School for official use, and the Headteacher or Chair of Governors must be advised of the action taken. All such gifts must be registered in accordance with point 7.0 of this Code.

6.3.3 On occasions an employee may become a beneficiary of a Will as the result of service provided on behalf of the school; in these cases the Headteacher or Chair of Governors should be consulted and the Director of Education informed.

6.4 **Hospitality**

6.4.1 Employees may only accept offers of hospitality if there is a genuine need to exchange information or represent the School in the community. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community within Gloucestershire and where the School should be seen to be represented. All such hospitality must be properly authorised and recorded by the Headteacher or, in the case of the Headteacher, the Chair of Governors. Exceptions to this rule must be properly authorised and recorded by the Headteacher or the Chair of Governors.

6.4.2 Acceptance of hospitality through attendance at relevant conferences and courses is acceptable where the hospitality is corporate rather than personal, or where the Headteacher (or Chair of Governors in the case of the Headteacher) gives consent in advance and where it is clear that any

purchasing decisions are not compromised. There are some circumstance when it is unacceptable see point 6.5.2.

6.4.3 An offer of hospitality to individual employees calls for special caution particularly if the host is undertaking, or applying to do business with the School/Council or hoping to obtain a decision from it. It is very important to avoid any suggestion of improper influence.

6.4.4 A working lunch of modest standards to allow the parties to discuss business would normally be acceptable; this is a case where the hospitality is secondary to a specific working arrangement. On the other hand, it would not be acceptable conduct for an employee to accept such things as:

6.4.4.1 A holiday*
6.4.4.2 Tickets for concerts, theatre or sporting events
6.4.4.3 The use of a company flat or hotel suite
6.4.4.4 Expensive meals or entertainment
6.4.4.5 (*This condition would not apply to those staff who, as part of their approved duties are required, with the approval of the Headteacher/Governing Board to accompany pupils or undertake risk assessment etc. relating to school trips/visits).

6.4.5 Hospitality must not be accepted unless the acceptance can be readily acknowledged in public or is similar to that which the School would provide in the same circumstances.

6.4.6 There are occasions when an offer of hospitality of any kind must be declined e.g. when the person offering the hospitality has a current issue with the School/Council such as a tender under consideration or is involved in a contract dispute.

6.4.7 Offers of hospitality accepted or rejected must be registered by employees to their Headteacher or in the case of the Headteacher, the Chair of Governors. The details to be registered must be in accordance with that shown in point 7.0 of this Code.

6.5 **Sponsorship**

6.5.1 Where outside organisations, contractors or potential contractors wish or seek to sponsor a School activity, the basic conventions concerning acceptance of gifts or hospitality apply. In some cases sponsorship which yields significant income may be covered by the EU Procurement Regulations and specialist advice should be sought before it is accepted.

6.5.2 Where the School/Council acts as a sponsor for an event or service, neither an employee or any partner or relative must benefit from such sponsorship without there being full disclosure to an appropriate manager of any such interest. Similarly, where the School/Council through sponsorship, grant aid, financial or other means, gives support in the community, employees should ensure that impartial advice is given and that there is no conflict of interest involved.

7.0 Register of gifts and hospitality

7.1 A register will be maintained by every Headteacher detailing all offers of gifts or hospitality made to employees in their department. The following information will be recorded, based on information reported by employees:

7.1.1 the person or body making the offer
7.1.2 the member of staff to whom the offer was made
7.1.3 the gift or hospitality offered

7.1.4 the circumstances in which the offer was made
7.1.5 the action taken by the member of staff concerned
7.1.6 the action taken (if any) by the Headteacher (or in the case of the Headteacher the Chair of Governors).

7.2 A similar register will be maintained by the Chair or Governors in relation to Headteachers

7.3 Where a suspected breach has been reported a formal investigation will be undertaken and recorded.

7.4 **Bribery Act 2010**

7.4.1 The Bribery Act 2010 came into force in the UK on 1st July 2011. It amends and reforms the UK criminal law and provides a modern legal framework to combat bribery in the UK and internationally. Staff need to be aware of their obligations under this Act, which sets out the criminality of accepting and giving of bribes. This applies to both individual staff and the School/Council corporately.

7.4.2 The Bribery Act creates the following offences:

7.4.2.1 Active bribery: promising or giving a financial or other advantage
7.4.2.2 Passive bribery: agreeing to receive or accepting a financial or other
7.4.2.3 advantage
7.4.2.4 Bribery of foreign public officials
7.4.2.5 The failure of commercial organisations to prevent bribery by an associated person (corporate offence).

7.4.3 The penalty under the Bribery Act is an unlimited fine and/or imprisonment up to a maximum of 10 years.

7.4.4 Full details of the Act can be found at: http://www.legislation.gov.uk/ukpga/2010/23/contents

8.0 Disclosure and use of information

8.1 The School/Council believes that, subject to the content of points 8.2 to 8.8 below, information should normally be disclosed unless it is in the public interest not to do so. Employees will be advised by their Headteacher of the information in their school which the School or Governing Board does not wish to be disclosed without specific written permission. If in doubt, raise the matter with the Headteacher or Chair of Governors as appropriate.

8.2 Many employees obtain information which has not been made public and/or is confidential. Employees may also have access to personal information about other individuals. This information must only be disclosed to a third party where there is a legal responsibility to provide it, or where the individual provides a written authority for the information to be provided.

8.3 The restrictions in points 8.4 to 8.8 apply equally to information which an employee may obtain from their employment about a contractor, debtor or creditor of the School/Council.

8.4 No employee, unless specifically authorised to do so, may communicate to the public or press any information about the discussions or decisions of the School/County Council or any of its Committees following the exclusion of the public and press, with the exception of information which is required to be published by law.

8.5 As a general rule employees must not enter into any public correspondence or debate on a matter related to their official duties, or in respect of which they hold official information, unless this is done with the consent of their Headteacher. Similar considerations exist covering the position of employees invited to participate in press interviews, radio or television programmes, etc., where the subject relates directly or indirectly to their work for the School. Employees invited to take part in such programmes should discuss the position with their Headteacher before replying to the invitation.

8.6 Employees must adhere to the School's published rules and requirements relating to personal and/or sensitive information, as covered by current Data Protection legislation. In particular, information must not be disclosed to unauthorised people or organisations.

8.7 Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.

8.8 Employees must make themselves aware of and comply with published Information Management and Security policies, procedures and standards relating to the protection of information and secure use of ICT systems, including use of the Internet and E-mail and the acquisition and use of software. A serious breach of the rules is likely to lead to disciplinary action.

9.0 Political neutrality

9.1 Employees of the School must not allow their own personal or political opinions to interfere with their work.

10.0 Relationships

10.1 Governors

10.1.1 Mutual respect between employees and Governors is essential to good local government. Employees and Governors should use the correct school procedures to deal with any work related issues.

10.2 Students

10.2.1 Staff should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. Where staff need to make a social contact this should be approved by the Headteacher.

10.3 Contractors

10.3.1 All relationships of a business or private nature with external contractors, or potential contractors, must be made known to the employee's immediate line manager. Orders and contracts must be awarded on merit, through fair competition, and no special favour should be shown to businesses run by, for example, friends, partners or relatives. No part of the local community should be discriminated against.

10.3.2 No employee shall purchase for private purposes goods or services from a firm which has dealings with the School where the firm is offering preferential terms to the individual employee (directly or indirectly) because of a contractual, business or other relationship with the School. It also precludes employees from using, for private purposes, any special trading cards which the School/Council may hold for council business. It does not, however, preclude employees benefiting from general discounts offered by suppliers to all School employees or made available by the School, Council or trade unions on behalf of staff generally.

11.0 Electronic communication

11.1 Staff must exercise caution when using information technology and be aware of the risks to themselves and others. Particular consideration must be given to any references to the school or anyone connected with the school bearing in mind the wide audience of any communication.

11.2 Staff should not make contact with students on social networking sites unless this is specifically agreed for the provision of academic information. Other electronic communication should be conducted through the school's communications systems when there is a clear and demonstrable school reason.

12.0 Appointments and other employment matters

12.1 It is contrary to the School's HR policies for an employee to make an appointment/engagement which is based on anything other than the ability of the individual to undertake the duties of the post. Employees must not be involved in an appointment/engagement where they are related to an applicant, or have any personal or business relationship outside work with them.

12.2 Employees must not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner or close personal friend.

12.3 Employees of the School shall inform their Headteacher or, in the case of the Headteacher, the Chair of Governors, of any relationship known to them to exist between themselves and a candidate for an appointment/engagement in which they are directly involved. If a candidate deliberately omits to disclose a relationship they will be disqualified. If the omission is discovered after appointment or engagement they shall be liable to dismissal.

12.4 Employees involved in appointments/engagements must, where practicable, ensure that references are obtained from the current and previous employer of the candidate to whom they wish to formally offer a post. Ideally both referees should be senior persons, one from the candidate's present employer and the other from their previous employer.

12.5 In the case of applicants leaving full-time education or not having worked since doing so, the Head of School, College, University etc. should be named as one of the referees.

13.0 Undertaking additional work outside of the school

13.1 Full-time employees shall devote their whole time service to the work of the School, and shall not engage in any other business, including self-employment, or take up any other additional appointment without the express written prior consent of their Headteacher or in the case of the Headteacher the Chair of Governors. The Headteacher or Chair of Governors reserves the right to withdraw such consent at any time.

13.2 All prospective employees shall, prior to appointment, provide details on the School's standard application form of any other employment(s) in which they are engaged, giving full details of the employer, job title and the hours worked per week in each job. (This information will be examined to see whether any other existing employment(s) is in conflict with the employment being sought with the School and whether, in overall terms, the total hours of all the employments exceed 48 per week - as per the Working Time Regulations 1998.)

13.3 Existing part-time employees must declare any other employment to the School in order that the latter can ensure that there is no conflict of interest between such employment and that there is adherence to the Working Time Regulations.

13.4 Employees should avoid situations where a conflict between work and personal interests may arise.

13.5 Undertaking unpaid activities outside School employment may, on occasions, be detrimental to the School's interests. Employees should be mindful of any potential conflict of interests in such situations.

13.6 No personal business activity or outside work of any sort may be undertaken by an employee during their normal working hours for the School.

13.7 **Consultancy, Lecturing, Fee Paying Work**

13.7.1 Where a request is received for any employee to make a presentation, speak at a seminar or lecture on a course, within their normal field of work and during their normal working hours, the work will be undertaken on behalf of the School and any fee will be treated as income for the School.

13.7.2 Where an employee is approached to undertake fee paying work the School has determined that the fee is to be treated as income for the employee if all the work, including preparation, is undertaken outside normal work hours. In the case of activities which are prepared and/or take place partly during normal working hours, the Governing Board must decide what proportion is due to the individual, having due regard for the current School Teachers Pay & Conditions Document. If the split is 50/50 then no more than 50% of the fee should be paid to the individual. All fees paid must be processed through the payroll. All consultancy, lecturing and other fee paying work must be approved by the employee's Headteacher or in the case of the Headteacher the Chair of Governors.

13.8 **Intellectual Property**

13.8.1 Intellectual property is a generic term that includes inventions, creative writings and drawings. If these items are created as part of an employee's normal course of employment then, as a general rule, they belong to the School.

14.0 Arrest or conviction on civil or criminal charges

14.1 An individual must, as soon as practicable inform their line manager, at each stage, if they are arrested, charged, refused bail, required to attend court, convicted or sentenced for any criminal offence. This does not apply to traffic offences unless the possible penalty includes imprisonment or disqualification from driving or involves an official vehicle. Failure to inform will be considered an act of gross misconduct.

15.0 Membership of clubs, societies and other organisations which are not open to the public and/or which have secrecy about rules, membership, etc.

15.1 The intention of this Code and procedures is to ensure transparency and openness and that no reasonable person can question the integrity and motives in connection with an employee's employment with the School.

15.2 All employees must declare membership of any organisation which is not open to the public, where there is a commitment of allegiance, and /or which has secrecy about rules, membership or conduct. This declaration needs to be made through completing a form held by each Headteacher.

16.0 Conflict of interest

16.1 Where employees belong to any club, society, charity or similar body and any person within it or the club, society or similar body itself may benefit from a decision or action employees may take in their work with the School, then they must register their interest and discuss what action should be taken with their line manager or Headteacher.

16.2 A conflict of interest may be defined as a situation in which an employee has a private or personal interest sufficient to influence objectivity when exercising official duties. However, employees are not to be subject to unreasonable restrictions on their private activities as a result of their employment with the School.

17.0 Equality issues

17.1 All employees must comply with the School's policies on equal opportunities in employment and with those relating to service delivery.

18.0 Health and safety issues

18.1 Employees should ensure they read and follow all health and safety policies and arrangements relating to their employment.

19.0 Confidential reporting procedure for employees (whistle-blowing)

19.1 Please refer to the School's Whistleblowing Policy which sets out the procedure for employees who wish to report, in strict confidence, their serious concerns about any aspect of the School's work or the behaviour or standard of conduct of other employees or anyone associated with the work and services provided by the School.

20.0 Breaches of the code of conduct

20.1 Any suspected breach of this Code must be:

20.1.1 Immediately reported to the Headteacher and to the Chair of Governors or, in the case of the Headteacher, to the Chair of Governors

20.1.2 Reported through the confidential reporting procedure for employees. Please see the School's Whistleblowing Policy.

20.2 Where a suspected breach has been reported, a formal investigation into that suspected breach will be undertaken.

20.3 Failure to comply with any of the standards detailed in this Code may result in formal disciplinary action, under the Conduct Policy, including dismissal.