



Code of Conduct

2021

Great Heights Academy Trust

Code of Conduct (adopted from Calderdale LA's policy & Educate HR policy)

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Great Heights Academy Trust Code of Conduct

Failure to comply with this Code of Conduct may lead to disciplinary action that could include dismissal.

1. Accountability

1.1 An employee must be accountable to the Trust for his or her actions. The code sets out minimum standards expected from employees and provides a framework preventing misunderstandings or criticism. All employees must keep to the standards of this code and carry out their duties fairly and honestly.

1.2 Breach of this standard is a serious matter and may result in disciplinary action or dismissal depending on the circumstances. Gross Misconduct is the kind of behaviour that will destroy the trust, which is the basis on which an employee's contract is based and justifies the Trust in dismissing an employee without notice.

2. Honesty, Integrity, Impartiality and Objectivity

2.1 An employee must perform their duties with honesty, integrity, impartiality and objectivity.

2.2 Trust employees are expected to give the highest possible standard of service to the public, and where it is part of their duties, to provide appropriate advice to fellow employees, with impartiality. An employee must treat others with respect, not discriminate unlawfully against any person and treat everyone professionally.

2.3 Employees must report to their Senior Officer any impropriety or breaches of this Code, Contracts Procedure Rules and Financial Procedure Rules, Academy conventions or criminal offences they become aware of relating to Academy employment.

2.4 Staff must never be under the influence of alcohol (or any substance which may affect their ability to care for children) whilst at work. Staff must also seek medical advice if they are taking medication which may affect their ability to care for children and must inform their line manager in the event of such a situation arising.

2.5 Employees are encouraged to report all concerns they may have regarding fraud and corruption. This applies not just to acts perpetrated by Trust employees, but any fraud and corruption suspected as being perpetrated against the Trust by non-Trust employees.

NB. The Trust has a separate Whistleblowing Policy.

2.5 The public is entitled to demand of a Trust employee conduct of the highest standard and public confidence in their integrity which would be shaken were the least suspicion to arise that they could in any way be influenced by improper motives.

2.6 Under the provisions of this Code of Conduct a number of matters are required to be declared by an employee. Declarations relating to any of these matters must be made on a declaration of interest form which will be supplied to staff each academic year.

2.7 For example, an employee who is bound over, cautioned, or charged with a criminal offence of any nature must declare the fact of any such charge to a member of the Senior Management immediately.

2.8 Similarly, an employee who is charged with a road traffic offence committed while driving a Trust vehicle must always declare the fact of any such charge to the SMT.

2.9 Your contract of employment is essentially based on trust. That trust would be damaged if you:

were not truthful and honest in your dealings with the Trust, its clients and customers, your colleagues and your supervisor/manager

sought to deceive the Trust by withholding information, giving false information, or destroying, damaging or altering any records or documents without proper authorisation

misrepresent the Trust in your dealings with others or make any statement on behalf of the Trust which you are not authorised to do (e.g. giving a reference for a colleague on behalf of the Trust, making statements to the press or other media)

fail to respect and uphold the conditions of service of your fellow employees, or Trust's HR policies procedures and agreements

commit any act of misconduct or breach of your employment terms.

3. Safeguarding Children/Vulnerable Adults

3.1 The Trust is committed to protecting its children from harm.

3.2 All Trust workers are expected to safeguard any child or vulnerable adult who comes to their notice, where it is felt that they are suffering significant harm. The aim of this is to ensure that all Trust employees:

- understand their personal responsibility for protecting the children that they work with
- are able to take appropriate action if there are suggestions that a child is being abused
- are informed and able to respond in a helpful manner to any child who alleges or discloses that abuse is happening.

See '**Code of Safe Working Practice**' for further guidance.

NB: Employees should note that any concerns they may have, can be treated in confidence, as set out in the Trust's Whistleblowing Policy.

4. Diversity and Equality

4.1 All Trust employees should ensure that policies relating to equality issues as agreed by the Trust are complied with in addition to the requirements of the law. All members of the local community, customers, contractors, members of the local community and other employees have a right to be treated with fairness and equity.

4.2 The Trust therefore looks to all of its employees to play a part in making sure that it meets its commitments and provides high quality services fairly and equitably to the whole community.

4.3 All employees are required to treat colleagues and the public in a fair and equitable way, avoiding unfair discrimination in any form and anything that would demean, distress or offend other people.

4.4 The Trust takes these commitments very seriously and any deliberate act of discrimination or other serious breach of the policy by Trust employees may lead to disciplinary action being taken.

4.5 Some examples of unacceptable behaviour are:

- displaying offensive sexist or racist material or wearing T-shirts or other clothing, badges or tattoos which convey an offensive message
- making racist comments
- making sexually suggestive or sexist remarks
- making negative comments about a person's disability

4.6 You must not harass or discriminate against people you meet in the course of your work, particularly on grounds of:

race

nationality

gender

disability

Trades Union activities

religious beliefs

sexual orientation

marital status

HIV status

age

political beliefs.

5. Relationships

5.1 Employees' Relationships with the Local Community and Service Users

Employees should always remember their responsibilities to the community they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community as defined by the policies of the Trust. No part of the local community should be discriminated against.

5.2 Employees' Relationships with Contractors

5.2.1 Orders and contracts must be awarded in accordance with Contracts Procedure Rules. No special favour should be shown to businesses run by, for example, former employees or employers, friends, partners or relatives in the tendering process.

5.2.2 Employees should ensure that no 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.

5.2.3 Employees who engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a relationship in a private or domestic capacity with contractors, should declare that relationship on their pecuniary interests form.

6. Appointment of Staff

6.1 Employees involved in appointments should ensure that they are complying with the Trust's policy on Recruitment and Selection and that all appointments are made on the basis of merit. It would be unlawful for an employee to make an appointment which was based on anything other than the ability of the candidate to undertake the duties of the post.

6.2 In order to avoid any possible accusation of bias, employees should not be involved in an appointment where they are related to an applicant, or have a close personal relationship with him or her. Similarly, employees should not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, or with whom they have a close personal relationship.

See '**Recruitment Policy**' for further guidance.

7. Examinations and Malpractice

- 7.1 Malpractice is deemed to be an action or practice which threatens the integrity of public examinations, and/or damages the authority of those responsible for conducting them.
- 7.2 Staff must always follow the administrative regulations imposed by the examination board or awarding body in addition to any additional school protocols which may be in place. Failure to do so is likely to constitute malpractice.
- 7.3 The following are examples (the list is not exhaustive and other instances of malpractice may be considered and acted upon) of malpractice:
- altering the time or date of a fixed examination (beyond that permitted) without notifying the relevant awarding body
 - failing to keep examination papers secure prior to the examination
 - obtaining unauthorised access to examination material prior to or during an examination
 - assisting candidates in the production of coursework, beyond that permitted by the regulations
 - assisting candidates with direct reference to assessment content/scenarios during an assessment window (beyond that permitted by the regulations)
 - allowing candidates unsupervised access to coursework exemplar material, whether this is the work of former students or that provided by the awarding body
 - failing to keep student computer files secure
 - assisting or prompting candidates with the production of answers.

7.4 If any staff member is suspicious that malpractice may have taken place, or is about to take place, this should be reported immediately to a member of the senior leadership team.

8. Openness

8.1 It is generally accepted that open government is best. The law requires that certain types of information must be available to Members, auditors, government departments, service users and the public. Employees must be aware within their own sphere of activity which information the Trust holds confidential and act accordingly.

8.2 An employee must be aware of and respect the confidential nature of the information obtained by them in the course of official duties and must not disclose any such information to another employee of the Trust without good cause.

8.3 Employees' primary duty is to the Trust and therefore should 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.

8.4 Disclosure of confidential information to any person or agency outside the Trust must comply with the provisions of Contracts Procedure Rules and also should only take place with the express permission of the employee's Senior Officer, other than where required by the law.

8.5 Information regarding an employee of the Trust must not be released outside the Trust without the employee's written permission unless the Trust has a duty to do so.

8.6 If to any degree the work of an employee of the Trust involves the gathering, collation, processing, inputting, extraction or any other form of manipulation of personal information relating to any individual person, whether a member of the public or an employee and such personal information is held or is intended to be held on any computer system operated by the Trust, such an employee must comply with either the Data Protection Act or General Data Protection Regulation (GDPR).

8.7 Academy customers, certain suppliers and employees are entitled to protection of their privacy. The Data Protection Act or General Data Protection Regulation (GDPR) imposes a legal duty on individuals. Employees must keep all personal data confidential, whether computerised or manually held, and comply with the law and academy policies. If an employee works with computerised or manually held information systems, they must ensure that information about living, identifiable people is accurate and up to date and that it is kept confidential.

9. Personal Interests

9.1 Employees must declare any financial interests which could conflict with the Trust's interests. A central register of such declarations shall be maintained by the Trust (See Appendix 1)

9.2 Employees must declare any non-financial interests that they consider could bring about conflict with the Trust's interests. (See Appendix 1)

9.3 Employees should declare membership of any organisation not open to the public without formal membership and having a commitment of allegiance and which has secrecy about rules or membership or conduct.

9.4 An employee with an actual or potential personal interest in any work related matter arising during their employment with the Trust must immediately inform the Chief Operations Officer in writing the actual or potential personal interest and also take any appropriate steps necessary to maintain the integrity of the Trust.

9.5 For these purposes a personal interest of a spouse or partner or any other relative or any person with whom they have a close personal relationship is deemed to be a personal interest of the employee.

10. Registration of Interests

10.1 At work or during off duty hours an employee of the Trust must not subordinate their duty to their private interests or put themselves in a position where their duty and their private interests conflict.

10.2 No off duty employment, required to be approved by the Trust or otherwise, or any other activity must conflict with or react detrimentally to the Trust's interest or in any way weaken public confidence in the conduct of the Trust's business. If there is any doubt in the employee's mind as to whether a conflict does or does not exist they should always seek approval from the Principal/CEO.

10.3 Employees on Scale 6 and above of the Trust must inform the Principal of their intention to undertake outside work, and the nature of such work, with a view to seeking approval to undertake such work. Employees on Scale 6 and below who wish to undertake outside work must not have a conflict of interest or work over an average 48 hours over a 4 week period. If there is a conflict of interest between this outside work/activity and the employee's position with the Trust, approval may not be given. If there is any doubt in the employee's mind as to whether a conflict does or does not exist, they should always seek clarification first from their Line Manager.

10.4 TV, radio, lecturing and interview fees are dealt with in accordance with the Trust's existing policy on such fees:-

If the lecture is prepared and delivered in Trust time, the lecturing fee is to be paid to the Trust.

If the lecture is either prepared or delivered in Trust time the Employee receives half the fee and the Trust the other half.

10.5 In cases where the employee is representing the view of the Trust, or speaking on issues that are directly connected with their work, the whole fee to be paid to the Trust.

11. "Whistleblowing"

11.1 This policy reflects the Trust's commitment to good practices, valuing staff and seeking continuous improvement in service delivery. The "Whistleblowing" policy provides a mechanism whereby employees can express any concerns they may have about a colleague or a Service, without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable employees to raise concerns within the Trust rather than overlooking these concerns or "blowing the whistle".

11.2 Employees can sometimes have concerns about colleagues or about an Academy Service, but they may not feel able to express those concerns, because they feel that speaking up would be disloyal to their colleagues or to the Trust. Employees are encouraged to use the procedure set out in the Whistleblowing Policy to raise concerns within the Trust and to receive feedback on any action taken.

12. Stewardship

12.1 Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner ensuring that the provisions of Contracts Procedure Rules and Financial Procedure Rules are complied with in full. They should strive to ensure value for money to the local community and to avoid legal challenge to the Trust.

12.2 An employee should not use any Academy equipment stationery material or any other facility for his or her own private purposes. An exception to this is where the express consent of the employee's Manager has been given for the use of such facilities in connection with attendance on an Academy approved course of study. A further exception is where the consent of their Manager has been obtained and payment is made by the employee for the use of Trust facilities. Any such use must not have any degree of commercial application for the benefit of the employee or any third party.

13. Corruption

13.1 Employees should be aware that, under the law it is a serious criminal offence for them corruptly to receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour, or disfavour, to any person in their official capacity.

13.2 Any attempt by any person or organisation to offer an employee of this Trust any gift, loan, fee, reward or advantage in circumstances that could possibly to any degree be seen as being made as a bribe must be immediately reported by the employee to the Principal. The Principal must immediately report any such attempts they have been notified of to The Trust Board.

13.3 Employees must declare to their own Manager, all other gifts received or offered, in the course of or in relation to their employment. The Trust must maintain a written record of any such gifts received and make arrangements for the retention, return, or disposal to the Trust's or public's benefit of the gift and officially record the action taken as a permanent record. (See '**Code of Safe Working Practice**' for guidance)

13.4 An employee of the Trust who becomes aware that they are a beneficiary or potential beneficiary of any gift, legacy or bequest from the estate of a client of any Trust service with whom they have had official contact with during any period of their employment with the Trust, must declare this to their Manager immediately. The Trust will interview or arrange for a Senior Officer to interview the employee to establish that the reputation, integrity or good standing of the Trust has not been put at risk by acts or omissions of the employee that were or could be seen to be undue influence on the client. If the Trust considers that the reputation, integrity or good standing of the Trust has been put at risk, disciplinary action will ensue. (See '**Code of Safe Working Practice**' for guidance)

13.5 An employee of the Trust must not assist, advise or otherwise become involved in a client's personal financial arrangements domestic or otherwise unless such involvement is a recognised and authorised duty of the employee's current post.

14. The Press and Media

Staff members must not deal directly with the press or the media unless required to do so as part of their duties, or alternatively have been given express authority to do so by the CEO.

15. Separation of Roles During Tendering

15.1 Employees involved in any tendering process including any internal tendering process should be clear on the separation of client and contractor roles as agreed by the Trust. Senior employees who have both a client and contractor responsibility must be aware of the need for accountability and openness.

15.2 Employees in contractor or client units must exercise fairness and impartiality when dealing with all customers, suppliers, other contractors and sub-contractors.

15.3 Employees who are privy to confidential information on tenders or costs for either internal or external contractors should not disclose that information to any unauthorised party or organisation.

16. Hospitality

16.1 Hospitality should only be accepted if it is important to the business of the Trust. There is a clear difference between authorised attendance in an official capacity at a function, for example organised by another Trust or other public body, and the acceptance of hospitality from a private individual or private sector company with an actual or potential commercial interest with the Trust.

16.2 Employees should only accept offers of hospitality if there is a genuine need to impart information or represent the Trust 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 or where the Trust should be seen to be represented, or when it is important to the business of the Trust. They should be properly authorised and recorded.

16.3 It will not, however, always be courteous and in the best interests of the Trust to reject offers of hospitality on a modest scale. Invitations may be accepted provided that no offence is caused to the integrity of the Trust and the financial value of the hospitality is reasonable. Before any invitation may be accepted the approval of the employee's Manager must be given. The Trust must maintain a written record of all offers of hospitality which have been accepted by members of the Trust.

16.4 Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal, and where any purchasing decisions are not compromised. Where visits to inspect equipment etc are required, employees should ensure that the Trust meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions.

16.5 When receiving authorised hospitality, employees should be particularly sensitive as to its timing in relation to decisions which the Trust may be taking affecting those providing the hospitality.

16.6 When hospitality has to be declined those making the offer should be courteously but firmly informed of the procedures and standards operating within the Trust.

16.7 Where by force of circumstances the approval of an employee's Manager cannot be reasonably obtained, an employee may accept an invitation where having regard to all the circumstances, they believe and have reasonable grounds for believing that the consent of their Manager would be given. It is the responsibility of the employee to seek retrospective approval in all cases and to establish, if asked, why the consent of their Manager could not be obtained, what reasonable grounds they relied on and what justified acceptance. A written record must be maintained by the Trust.

16.8 Nothing above prevents an employee of this Trust offering a contractor or supplier reasonable hospitality at the expense of the Trust, provided that all the circumstances justify doing so and the prior consent of the employee's Manager has been obtained or force of circumstances. A written record must be maintained by The Trust.

See '**Code of Safe Working Practice**' for guidance on the propriety or otherwise of gifts, rewards and favouritism.

17. Sponsorship – Giving and Receiving

17.1 Where an outside organisation wishes to sponsor or is seeking to sponsor an Academy activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.

17.2 Where the Trust wishes to sponsor an event or service neither an employee nor any partner, spouse or relative must benefit from such sponsorship in a direct way without there being full disclosure to an appropriate manager of any such interest. Similarly, where the Trust through sponsorship, 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.

18. Forms, Policies and Procedures

Copies of all the Forms, Policies and Procedures referred to in this document can be obtained from your Line Manager.

APPENDIX 1

Greetland Heights Academy Trust

Register of Business Interests

Name **Joe Bloggs**

Governor/Staff *

* Neither I nor any close relatives have interests to register/I wish to register the following interests:

1 Any directorships, partnerships, employment, office, trade, profession or vocation that provide goods or services to Great Heights Academy Trust

My wife's brother has been employed as Contracts Manager for Joe Bloggs Ltd since 2000. Joe Bloggs Ltd has been included in the Academy's Approved List of Contractors since August 2006.

2 Any sponsorship

.....

3 Any land in the area of the Trust or licences to occupy land

.....

4 Any interests in companies and securities which the academy may use, including close personal relationships

.....

5 Any relationships with members of the school's staff/governors

.....

6 Holding another public office, trusteeship and governorships

.....

Signature Date

Signature Date

Signature Date

Signature Date

* Please delete as appropriate. For each interest the name of the business; the nature of the business; the nature of interest; and the date the interest began.