

CODE OF CONDUCT POLICY

SCOPE STATEMENT

This policy applies to all staff in the school.

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Introduction

The public is entitled to expect the highest standards of conduct from all qualifying employees of relevant authorities. The role of such employees is to serve their employing authority in providing advice, implementing its policies, and delivering services to the local community. In performing their duties, they must act with integrity, honesty, impartiality, and objectivity. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chain. This Code of Conduct outlines the existing rules and conditions of service which apply to all school employees and is designed to provide clear guidance to assist employees in their day-to-day work.

Every employee has a responsibility to conduct themselves in their private lives in a manner that does not compromise their position in the workplace or put themselves in a position where their job, or the school and Council's interests and their own personal interests' conflict.

All employees of the Council and appointed to the school must have due regard and uphold the standards and behaviours expected of this code and all other policies, protocols, and procedures of the school and Council. Time should be given to ensure staff can read and understand these policies. Reference should also be made to Nolan's Seven Principles of Public Life. All employees of the Council and appointed by the school are required to observe and uphold the standards of the code and all policies and procedures of the school and Council where reasonable. Failure to meet the standards and requirements of this code may result in disciplinary action against an employee or action for breach of their employment contract with the school and council. Further advice or guidance can be accessed from human resources or legal services. In addition to this code, those employees who have professional memberships or registration will also need to adhere to specific professional codes of conduct, e.g. [Education Workforce Council](#).

The issues covered in this document will affect some more than others.

1. Standards

- 1.1 Local Government 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 governors, councillors, and fellow employees with impartiality. Employees will be expected, through the procedures set out in the [School's Whistleblowing Policy](#), and without fear of recrimination, to bring to the attention of the appropriate level of management any irregularity or deficiency in the provision of service. Employees must report to the appropriate manager any impropriety or breach of procedure.

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2. Disclosure of Information

- 2.1 The school and Council is committed to open government and the law requires that certain types of information must be available to governors, auditors, government department, service users and the public.
- 2.2 Employees should ensure that the individual or personal circumstance of clients and users of Council services are treated confidentially. Information should not be released to anyone other than an individual who is entitled to receive it or needs to have access to it for the proper discharge of their functions. Nothing in this code can be taken as overriding existing statutory or common law obligations to keep certain information confidential, or to divulge certain information.
- 2.3 Employees 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.
- 2.4 The school and Council has policies which provide guidance on disclosing or maintaining information which can be found here. E-learning resources are also available for staff to access.
- 2.5 The use of non-corporate communications channels, such as personal emails or WhatsApp should not be used for official business, however, if this cannot be avoided for example in an emergency then employees/members must ensure that all official information on non-corporate communication channels is transferred promptly onto official systems.
- 2.6 Erasing, destroying, or concealing information with the intention of preventing its disclosure following receipt of a formal request for information is a criminal offence under section 77 of the Freedom of Information Act 2000.

3. Safeguarding

- 3.1 All employees should be alert to the possibility of abuse and understand their roles and responsibilities when working with children at risk and the requirement for reporting concerns.
- 3.2 It is not the responsibility of any one employee to determine whether abuse has taken place or if an individual is at risk of harm, however, employees do have a responsibility to report if there are concerns.
- 3.3 The Corporate Safeguarding policy provides information on how to report a concern about a child or adult at risk. As well as general information and resources on safeguarding.

4. Political Neutrality

- 4.1 Employees serve the Council as a whole. It follows they must serve all councillors and not just those of the administration and must ensure that the individual rights of all councillors are respected.

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- 4.2 It will also be a requirement of some employees' job role to advise political groups. If this is the case, it must be done in ways which do not compromise their political neutrality.
- 4.3 Certain employees will be in politically restricted roles, and they will be subject to restrictions enforced by legislation.
- 4.4 Employees, whether or not politically restricted, must follow every lawful expressed policy of the school and Council and must not allow their own personal or political opinions to interfere with their work.
- 4.5 Those roles that are identified as being politically restricted will be reviewed by the Corporate Management Board and detailed within an employee's Written Statement of Particulars subject.

5. Relationships

5.1 Councillors/Governors

For some employees, their role is to give advice to governors, councillors and senior managers, and all are there to carry out the school and Council's work. Mutual respect between employees and councillors/governors is essential to good local government, more detail can be found in the protocol on Member Officer Relations.

5.2 The Local Community and Citizens

5.2.1 Employees should always remember their responsibilities to the public and ensure courteous, efficient, and impartial service delivery to all groups and individuals within that community as defined by the school and Council's policies. Employees also expect the same respect in return.

5.3 Contractors

5.3.1 All relationships of a business or private nature with external contractors, or potential contractors, should be made known to the appropriate manager. Orders and contracts must be awarded on merit, by fair competition against other tenders, and no special favour should be shown to businesses run by, for example, friends, partners, or relatives in the tendering process.

5.3.2 Employees who engage or supervise contracts 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 to the line manager, who will notify the service Group Manager.

5.4 Separation of Roles during tendering

5.4.1 Employees involved in the tendering process and dealing with contractors should be clear on the specification of client and contractor roles within the school and Council. Senior employees who have both a client and contractors' responsibility must be aware of the need for accountability and openness.

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- 5.4.2 Employees who are involved as part of the evaluation panel for a tender process must complete and return to the procurement officer a Confidentiality Undertaking Form and a Conflict-of-Interest Declaration form. These are available on the [Procurement intranet page](#)
- 5.4.3 All employees must exercise fairness and impartiality when dealing with all customers, suppliers, other contractors, and sub-contractors.
- 5.4.4 Employees who are privy to confidential information on tenders technical or commercial information for either internal or external contractors should not disclose that information to any unauthorised party or organisation.
- 5.4.5 Employees who have an existing or potential interest in a company that may bid for a tender should inform the appropriate manager and withdraw from the tender process, including any preparation of tender documentation.
- 5.4.6 Employees should be especially careful to ensure that no special favour is shown to current or 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.
- 5.4.7 Employees that engage or supervise contractors / suppliers or have an official relationship with contractors / suppliers and have previously had or currently have a relationship in a private or domestic capacity should declare to their line manager.

6 Appointments and Other Employment Matters

- 6.1 Employees involved in appointments should ensure that these are made on the basis of merit. It would be unlawful for an employee to make an appointment which is based on anything other than the ability of the candidate to undertake the duties of the post. In order to avoid any possible accusation of bias, employees should declare a relationship/ interest in a candidate and not be involved in an appointment where they are related to an applicant or have a close personal or familial relationship with a candidate.
- 6.2 Similarly, employees should not be involved in decisions relating to discipline, promotion for any other employee who they have a close personal or familial relationship.

7 Investigations by Monitoring Officers

- 7.1 When a Monitoring Officer is undertaking an investigation in accordance with regulations made under section 73(1) of the Local Government Act 2000 an employee must comply with any reasonable and lawful requirement made by that monitoring officer in connection with such an investigation.

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8 Outside Commitments (Secondary Employment)

- 8.1 Employees are required to inform the headteacher to take any secondary employment. All employees should be clear about their contractual obligations and should not take secondary employment or become involved in any other activity, whether paid or not, which conflicts with the Council or school's interest. An employee's obligations when proposing to pursue secondary employment are covered in the [Secondary Employment protocol](#).
- 8.2 Employees should seek advice from the headteacher on the ownership of intellectual property of copyright created during their employment.

9 Personal Interests and Opinions

- 9.1 The Council accepts that every employee has a right to their own opinion but should not allow any private or personal interests to affect how they do their job or make decisions.
- 9.1.1 Whilst it is accepted that in the workplace employees may discuss various matters and interest, they should ensure that any such discussions are amicable, respectful and do not express opinions that may contravene the Equality Act 2010.
- 9.1.2 An employee must not in their official or personal capacity:
- Allow their personal interests to conflict with the school and Council's reasonable and lawful requirements; or
 - Use their position improperly to confer an advantage or disadvantage on any person.
- 9.1.3 Employees are required to declare any potential conflict of interest if they have a connection with any business or organisation (including voluntary bodies) which deals with the council and impacts on their role. This can be declared using the [Declaration of Personal Interests](#) form and returned to the headteacher for their acknowledgement. If employees are unsure about a potential conflict of interest, they must speak with the headteacher.
- 9.1.4 Employees should declare to the headteacher their membership of any organisation, not open to the public without formal membership if that membership could reasonably be considered to result in a conflict with the business of the school or Council.
- 9.1.5 Every employee has a responsibility to conduct themselves in their private lives in a manner that does not compromise their contractual obligations or are detrimental to the interests or reputation of the school and Council. An employee should not put themselves in a position where their role and the school's interest conflict.
- 9.1.6 Employees must not undertake private or personal work of any description in working hours or in the office unless the employee has received specific permission by their manager/supervisor.

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9.1.7 The school requires all employees to notify their headteacher/chair of governors without delay of any criminal investigation, charge or caution imposed upon them, with the exception of minor driving offences if their role does not include the use of a car as detailed in their written statement of particulars.

9.2 Social Media

9.2.1 Employees must never publish or disclose any information on any form of social media site, about the school and Council which is not already in the public arena. Where employees have access to the internet as part of their role they are not permitted to access social networking sites such as Facebook, Twitter or similar. Please refer to the [ICT Code of Conduct](#) and [Social Media Protocol](#) for more information.

9.3 Financial Interests

9.3.1 Employees must declare to the Monitoring Officer, Section 151 Officer or publicly whenever they are present at any meeting of the Authority (whenever an Officer and a Member are present) any financial or non-financial interests which could conflict with the school and Council's interest.

9.4 Alcohol and Drug misuse

9.4.1 Employees have a responsibility to ensure that they attend work free from the consumption and influence of alcohol and/or substances. Employees must not return to or engage in formal school business following any consumption of alcohol and/or substances. This excludes hospitality and civic engagements when not returning to school business. For more detail on this issue please refer to the [Alcohol-and-Substance-Misuse Protocol](#)

10 Equality Issues

10.1 All employees should ensure that legislation relating to equality issues are complied with. All members of the local community, customers and employees have a right to be treated with fairness, equity, and dignity. The school and Council are fully committed to ensuring no individual suffers harassment or is treated unfavourably on the basis of any of the protected characteristics included within the Equality Act 2010.

11 Corruption

11.1 Employees should ensure that they are fully conversant with the [Anti-Fraud & Bribery Policy](#) and should report any suspicious activity to the Monitoring / Section 151 Officer.

11.2 Employees must report to the headteacher if anyone approaches them, which seems to them, or might seem to a third party, to be with the intention of obtaining some form of preferential treatment, or in any suspicious circumstances in connection with a contract.

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12 Use of Financial Resources

- 12.1 All employees involved in financial activities and transactions on behalf of the school and Council, including budgetary control, payments of accounts, payments of salaries and wages, petty cash and orders for works, grounds or services must follow the Council Financial Procedure Rules. Details on financial procedures and systems can be found [here](#).
- 12.2 Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner. They should strive to ensure value for money to the local community and to avoid legal challenge to the school and Council.

13 Gifts & Hospitality

- 13.1 Employees should not accept any significant personal gifts in the course of their duties, unless the item(s) are insignificant items of modest values such as mugs, calendars, pens, diaries, or other simple items of office equipment for use in the school, this includes parents/carers end of year/term gifts.
- 13.2 If item(s) are over £25 and not a end of year/term gift, employees should complete the [officer's declaration form](#) and forward to the Monitoring Officer within 28 days of receiving the gift/hospitality.
- 13.3 Employees should not acquire materials, labour, or plant at cost, trade, or discount prices from or through a contractor employed by the school and Council.
- 13.4 Employees should only accept offers of hospitality if there is a genuine need to receive or impart information or represent the school and council in the community. Offers to attend purely social or sporting functions should be accepted only when the school should be seen to be represented. They should be properly authorised and recorded.
- 13.5 Acceptance by employees of hospitality through attendance at relevant conferences, seminars and courses is acceptable where it is clear the hospitality is corporate rather than personal, where consent is given by or on behalf of the school and where purchasing decisions are not compromised.
- 13.6 When receiving authorised hospitality employees should be particularly sensitive as to its timing in relation to decisions which the school may be taking affecting those providing the hospitality.
- 13.7 In all cases gifts/hospitality refused and accepted should be entered and retained on the Council's register. The Monitoring Officer will maintain a register recording details of gifts and hospitality offered to employees. Employees are to notify the Monitoring Officer within 28 days of the offer being made using the [Gifts and Hospitality Form](#). Authorisation will be considered for the acceptance of the gift or hospitality. All relevant details will be added to the register which shall be available for public inspection and subject to annual inspection by the Council's Audit service.

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14 Review of the Code

14.1 The operation of the Code will be evaluated from time to time and will be subject to review as necessary.

15 Compliance

15.1 Any breach of the requirements set out within the code of conduct policy may lead to disciplinary action and could lead to dismissal.

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