



## Code of Conduct

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This document applies to all schools and operations of the Galileo Multi Academy Trust:  
[www.galileotrust.co.uk](http://www.galileotrust.co.uk)

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## 1. Introduction

All employees should be aware of the standards of conduct expected of them by their employer. The purpose of having a code of conduct is to:

- Make a clear statement about the standards of conduct expected
- Ensure the highest standards of conduct by identifying Trust standards which sit alongside professional codes and guidelines including the Teachers' Standards
- Help all employees to act in a way which upholds these standards
- To help build trust between Galileo Multi Academy Trust and its employees

This guidance aims to set and maintain standards of conduct that all employees are expected to follow. The Trust aims for an environment where everyone is safe, happy and treated with respect.

'Headteacher' is used throughout this code of conduct. Where an employee is a member of a centrally employed team, this would be their line manager. Where the employee is the Headteacher, this would be the Chief Executive Officer.

All employees of the Trust have a responsibility to ensure they comply with this code along with any other approved policies or procedures in use. Failure to observe the provisions of the code may be relevant in considering action under disciplinary procedures.

## 2. Scope

This policy applies to all employees and volunteers of Galileo Multi Academy Trust.

## 3. The Principles of Public Life

When working on behalf of the Trust, all employees must perform their duties in accordance with the Principles of Public Life as follows:

### **Selflessness**

You should take decisions solely in terms of the public interest. You should not do so in order to gain financial or other material benefits for yourself, your family or your friends.

### **Integrity**

You should not place yourself under any financial or other obligation to outside individuals or organisations that might, or might be perceived to, influence you in the performance of your official duties.

**Objectivity**

In carrying out public business, including awarding contracts and recommending individuals for rewards and benefits, you should make choices on merit.

**Accountability**

You are accountable for your decisions and actions to the public and must submit yourself to whatever scrutiny is appropriate for your office.

**Openness**

You should be as open as possible about the decisions and actions that you take. You should give reasons for your decisions and restrict information only when the wider public interest clearly demands.

**Honesty**

You have a duty to declare any private interests relating to your public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

**Leadership**

You should promote and support these principles by leadership and example.

In addition to this, Teachers must also adhere to the terms and conditions outlines in the School Teachers Pay and Conditions document (STPCD) and the Teachers' Standards which are set out by the Department for Education (DfE). These cover both teaching standards and personal conduct. Teacher's performance will be regularly reviewed against these professional standards.

## **4. Individual Responsibilities**

As a representative of Galileo Multi Academy Trust, all employees are expected to conduct themselves to the highest standards, and with honesty, integrity and professionalism in order to encourage colleagues and pupils to do the same.

All employees must:

- Maintain high standards in their attendance and punctuality
- Never use inappropriate or offensive language in the school
- Treat pupils and others with dignity and respect
- Show tolerance and respect for the rights of others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs
- Express personal beliefs in a way that will not overly influence pupils, and will not exploit pupils' vulnerability or might lead them to break the law

- Adhere to Teachers' Standards

## 4.1 Standards and Attitudes

All employees of the Trust are expected to give the highest possible standard of service, honesty and integrity in their work and to the public, the Trust and fellow employees.

The attitude of employees in dealing with people reflects on the Trust and member schools, so it is important that they are helpful, polite and courteous. People's impression of the Trust is strongly influenced by the views of the people who work for it and the comments employees make will be accepted by others, and therefore employees need to consider carefully the effect of what they say.

Employees should at all times avoid any appearance of improper conduct which may give rise to suspicion. Public perceptions are very important and all employees are expected to report to their Headteacher any perceived or anticipated impropriety, breach of procedure or policy of the Trust.

## 4.2 Workplace Protocols

Good levels of attendance and punctuality are essential and all employees must be punctual for work and any scheduled activities. Failure to fulfil your contracted hours will result in a deduction of pay and potential disciplinary proceedings.

Employees are required to work the hours stated in their contract of employment, or as required in the School Teachers' Pay and Conditions Document in respect of directed time, within the scope of their contract and through carrying out reasonable instructions in line with the requirements of their role. Employees should be at work at the proper start time (unless there is prior agreement to arrive late), to agree in advance with their Headteacher any planned absences (for example, a medical appointment), to agree with your Headteacher any annual leave, special leave or other leave of absence before they take any time off or book any holidays (except in cases of bereavement leave or emergency leave).

All employees are required to follow the Trust's absence reporting procedure if they are absent due to sickness.

Employees are required to comply with the Trust's equal opportunities policy and treat colleagues, pupils and external contacts, such as parents with dignity and respect. Unacceptable behaviour such as discrimination, bullying, harassment or victimisation will not be tolerated.

Where provided, employees are expected to wear and maintain any uniform, clothing and personal protective equipment provided to you by the Trust.

Employees are expected to complete mandatory training as required.

### **4.3 Personal Appearance**

The Trust aims to maintain an image of a professional public service organisation providing high quality services. A person's dress and appearance are matters of personal choice, however, staff should ensure that they dress decently, safely and appropriately for the roles they undertake. Outfits will not be overly revealing, and will not display any offensive or political slogans.

### **4.4 Conduct**

Whether in or outside work, employees must not conduct themselves in any way that creates doubt as to their suitability for their post or which could seriously damage the reputation and standing of the employee's own reputation or the reputation of the school or Trust. This includes conduct which would bring into question their suitability to work with children.

All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

If an employee is made aware of a concern being raised against them that alleges that they have engaged in behaviour that could potentially compromise their position within the workplace, they should discuss this with their Headteacher immediately.

Criminal offences or types of behaviour that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and could lead to dismissal. If arrested, convicted, cautioned, charged or bailed by the Police then the employee should disclose this to their Headteacher immediately. Failure to disclose this information is unacceptable and could lead to dismissal.

### **4.5 Outside Commitments**

The Trust recognises that employees are entitled to their private lives, however, an employee must not be in a position where, in our view,

outside commitments present a conflict of interest, weaken public confidence in our Trust or adversely impact upon their ability to carry out their role.

Employees must not seek to gain business in the course of carrying out their school duties, carry out any outside work or private interest during working hours, or use Trust facilities or equipment or confidential information in relation to commitments outside of work. Outside work includes any paid or unpaid work, including voluntary work, undertaken in addition to school employment.

Employees are able to take on work in addition to their existing contract of employment, providing it does not conflict with the performance of their duties in the role for which they are employed. In order to assess whether or not there might be a conflict, employees are required to inform their Headteacher and must ensure that additional hours worked do not contravene the Working Time Regulations or otherwise give the Trust cause for concern about health and safety at work.

## **5. Working with the Public, Children, Parents, Colleagues and Governors**

All employees must be mindful of the need to maintain professional boundaries and must consider whether their actions are warranted, proportionate, safe and applied equitably.

Trust employees are expected to work in a co-operative manner with their colleagues. The Trust is firmly committed to equal opportunities and believes that every employee has the right to work in a safe environment without the fear of discrimination, harassment or abuse. The Trust will not tolerate or condone harassment or bullying in any form.

- All employees must be polite, courteous and helpful when dealing with all members of the local community, children, parents, governors, colleagues and other professionals to develop productive and supportive relationships
- All employees must treat all groups and individuals with dignity and respect, value their opinions and beliefs and behave in an appropriate manner
- All employees must act in an open and transparent way with pupils and parents that will not lead any reasonable person to question their actions or intent
- All employees should promote good relationships between home and school
- Employees should exercise great care when expressing opinions in public about the pupils, School or Trust

- Employees should not make malicious or unfounded criticisms of, or accusations about, colleagues that may undermine them professionally or which are or could be perceived as being malicious, unfounded or unprofessional
- Employees must declare all close personal relationships with governors
- All employees must keep all children, parents / carers and employee's money, personal records, information and correspondence secure in accordance with the school policies and procedures, and Data Protection legislation and must not give any information, including information relating to pupils, parents / carers or colleagues, to anyone except those authorised to receive it
- Employees must not discuss a child with another child's parent or carer. Should a parent or carer attempt to discuss a child other than their own, staff members can listen but not comment and should not offer any information.
- Employees must not discriminate unfairly in the provision of facilities, services, employment practices or any other area of school duties

## 5.1 Relationships with Pupils

It is important that all working relationships, and relationships between employees and pupils, are conducted in a professional manner.

Interaction with pupils should always be appropriate to their age and gender and employees should not touch pupils, however casually, in ways or on parts of the body that might be considered indecent, unnecessary or familiar, or use inappropriate language.

It is an abuse of the professional relationship between an employee and pupil for the employee to:

- Enter into an improper association with a pupil, either inside or outside of the workplace, e.g. school trips, or when using social media
- Commit any acts against a pupil which are illegal
- Show undue personal favour or disfavour towards a pupil
- Endeavour to exert an undue influence on personal attitudes, opinions or behaviour which are in no way connected with the work of the Trust

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- This takes place in a public place that others can access



- Others can see in to the room
- A colleague or line manager knows this is taking place

Employees should safeguard their own position and may consider the need for a second adult to be present.

Staff should avoid contact with pupils outside of school hours if possible.

While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are not acceptable.

If an employee concerned at any point that an interaction between themselves and a pupil may be misinterpreted, this should be reported to the Headteacher.

## 5.2 Safeguarding of Pupils

Safeguarding and promoting the welfare of children is everyone's responsibility.

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All employees must be aware of their individual safeguarding responsibilities, including to provide a safe environment in which children can learn, to be aware of signs of abuse and neglect, to identify children who are suffering or likely to suffer from significant harm and to take appropriate action in such cases to prevent concerns from escalating.

In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

Employees have a duty to safeguard pupils from:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust.

As a Trust employee, you must:

- Be familiar with and follow and adhere to the Child Protection and safeguarding policies and procedures
- If a child reports any safeguarding issues report this immediately to the designated safeguarding lead and the Headteacher

- Report any safeguarding concerns about another member of staff immediately to the designated safeguarding lead and the Headteacher

Employees must not promise confidentiality to a child who reports a safeguarding issue to them.

Guidance on procedures relating to suspected or alleged child abuse is contained in the Child Protection policy.

## **6. Health and safety at work**

Galileo Multi Academy Trust has a legal duty of care for the health and safety and welfare of its employees. In addition, all employees must take reasonable steps to protect their own health and safety and that of other people who may be affected by their actions or omissions at work.

Employees have a duty to help prevent accidents and injuries at work by being aware of the policies that apply and complying with them.

## **7. Covid 19 (Coronavirus)**

Throughout the response to the Covid-19 pandemic all employees are expected to follow the relevant guidance issued by the government, Public Health England, NHS, the DfE as well as the school's own risk assessments. Employees should behave in a manner, both inside and outside of the workplace, that does not put themselves, colleagues or pupils at unnecessary risk of contracting or transmitting the virus. Where appropriate, failure to follow specific guidance or instruction in relation to the management of coronavirus may be considered a disciplinary matter and investigated accordingly.

## **8. Harassment at work**

All employees should work in an environment where everyone is treated with dignity and respect. The school will not tolerate any employee being subjected to bullying or harassment and any complaints of perceived bullying and harassment will be considered seriously.

Examples of actions that may constitute bullying or harassment include, but are not limited to:

- Exclusion or victimisation
- Insulting / offensive comments or language
- Inappropriate physical contact
- Inappropriate sexual advances
- Ridiculing or demeaning an individual

- Abuse or misuse of power which undermines or humiliates an individual
- Abuse of authority and use of threats to coerce others by fear
- Withholding information, removing areas of responsibility without discussion or impeding work performance
- Preventing progression by denying opportunities for promotion and training

## **9. Equality and diversity**

All members of the local community, parents and carers, and other Trust employees have a right to be treated with fairness and equity. Employees should become familiar with and observe all Trust policies relating to equality issues in addition to the requirements of the law.

## **10. Confidentiality and Disclosure of Information**

Employees should treat all information they receive in the course of their employment as confidential. The confidentiality of information should be respected and must never be used for personal or political gain. Deliberate exploitation of confidential information for personal gain may result in disciplinary action.

The law and the Funding Agreement requires that certain types of information must be available to auditors, government departments, the Education Funding Agency, service users and the public. Different rules apply in different situations.

The Trust processes personal data collected in line with its data protection policy. Inappropriate access or disclosure of data constitutes a data breach and should be reported in accordance with the Trust's Data Protection Policy.

Employees should make sure that they do not disclose confidential information to anyone who has no right to receive it and do not say or write anything that would constitute a breach of confidence. The Trust are only permitted to disclose confidential information where it is required by law or where the Trust has agreed to make the information available to the public. Where an employee is in any doubt as to whether they are permitted to release any particular information, they should always check with their Headteacher before any disclosure is made. Furthermore, information which is stored whether on computer systems or manually must only be disclosed in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulations 2018. All

employees must ensure they save, store, retain and share information in line with Trust policies and guidelines.

## **11. Appointment of Staff**

All Trust appointments will be made on the basis of the ability of the candidate to undertake the duties of the post. Employees involved in making appointments should do everything possible to ensure that these are made on the basis of merit and in accordance with the Trust policy on Recruitment and Selection and regulations on safer recruitment.

In order to avoid any possible accusation of bias, employees must not become involved in any appointment or any other decision relating to the discipline, promotion, pay or conditions of another employee, or prospective employee, if they are a relative or have a close personal relationship, nor where they have the opportunity to benefit, directly or indirectly, from an appointment.

In this paragraph 'relative' means a spouse, partner, parent, parent-in-law, son, daughter, step-son, stepdaughter, child of a partner, brother, sister grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse or partner of any of the preceding person. 'Partner' means a member of a couple who live together or who are involved in a romantic relationship. 'Close personal relationship' would include a person not employed by the Trust with whom an employee has a close business connection.

Personal relationships between colleagues who work together can give rise to conflicts of interest. Therefore, employees who have entered into a close personal or romantic relationship with a colleague are required to disclose this fact to their Headteacher. Any information declared or disclosed will be treated in strict confidence.

This information should only be considered to ensure that the existence of the relationship does not impact on the smooth running of the Trust or member schools.

## **12. Officer Interests**

Employees must disclose any personal conflicts of interest and must not involve themselves in any decisions or matters where their actions could be perceived as biased. A personal conflict may arise where an employee provides consultancy services in a private capacity which conflict with or are of a similar nature to the Trust's services. Another example is where an employee, acting in a private capacity, causes conflict with the service provided by the Trust to a service user.

Employee interests in contracts must be disclosed in writing where employees have any financial interest, direct or indirect, in any contract which the Trust has entered into or is proposing to enter into, or any application for a licence, consent or permission. Employees are also required to identify a partner, relative or close associate who might have a legitimate interest in Trust contracts or services.

Employees must also disclose in writing any interests where they are involved as either as an individual or as a partner in a business or as a Director of a Company or where they have a substantial shareholding in a public or private company which regularly has dealings with the Trust.

If employees are in any doubt as to what interests they need to declare they should seek guidance from the Chief Financial Officer. Failure by employees to declare interests in contracts or companies is a criminal offence. Failure to disclose a conflict of interest may result in disciplinary action.

### **13. Political Neutrality**

Politically activities relate to standing for public elected office, engaging in party political debate in a personal capacity, by speaking or writing in public and canvassing at elections.

An employee who proposes to engage in political activities must not allow their own personal or political opinions to interfere with their work and must at all times perform their duties in an objective manner.

### **14. Computer and IT Use**

The Trust wants employees to use computers to the full and to feel competent and comfortable about doing so, however, it is essential that computers and mobile devices are used appropriately. Any reference to computers should be taken to mean all computer equipment and any associated technology i.e. mobile phones/devices.

The misuse of computers is a serious matter and may result in employees being subject to disciplinary and, where appropriate, legal action.

Internet access for personal use is at the school's discretion and must not affect your performance or productivity at work. The school may monitor the use of the internet for legitimate business reasons, including compliance with this Code. By using the internet employees are deemed to have consented to the monitoring, recording and auditing of internet use.

## **15. Social Networking Sites / Media**

The growing popularity of personal web logs (blogs) and social networking sites, such as Facebook and Twitter, may raise issues for the Trust, particularly where employees choose to write about their work and the Trust / School in which they are employed.

Employees must ensure that the content of their blogs / social networking sites does not bring the Trust / School into disrepute or breach their obligations in relation to confidentiality and appropriate behaviour. Employees must not access personal blogs / social networking sites during working hours. When accessing such sites outside working hours employees are advised not to write about their work or make reference to the Trust / School on external web pages. Where an employee chooses to do so they must make it clear that the views expressed are theirs only and do not reflect the views of the Trust.

Employee social media profiles must not be available to pupils. Full names must not be used on social media sites as pupils may be able to find them. Employees should consider using a first and middle name instead, and set public profiles to private.

Employees must not make efforts to find pupils' or parents' social media profiles or attempt to contact pupils or their parents via social media, or any other means outside school, in order to develop any sort of relationship.

Employees are personally responsible for the content they publish on social media, blog or any other form of user-generated media. Please remember that internet content is never truly deleted or private. This means everything that is published will be visible to the world indefinitely. Employees must be sure that they want what they're posting to be in the public domain with their name on it indefinitely. If in doubt, don't post.

## **16. Mobile Phones**

Communication with children and vulnerable adults, by whatever method, should take place within clear and explicit professional boundaries. Employees should not share any personal information with a child, or young person and should not use their personal mobile to communicate with any young person or on a personal level or to take photographs / videos of pupils.

Schools should, wherever possible, provide devices such as cameras and mobile phones rather than expecting staff to use their own (e.g. on school trips). Staff should ensure that the device is secure so that unauthorised

access to data is prevented. Equipment provided by the school should not be used for personal use or shared with family members / friends.

Personal mobile phones should be stored securely away from learning environments and it is highly recommended that mobiles are switched off during work hours, and should only be accessed during breaks and lunchtime but not in the presence of young people. This also applies when in meetings with young people and parents.

Employees must inform the Headteacher or line manager immediately if contacted by a young person on a personal mobile.

## **17. Smoking and Vaping**

It is the policy of the Trust that all our workplace buildings are smoke-free, and all employees have the right to work in a smoke-free environment.

Smoking and vaping are prohibited on school premises or grounds including all enclosed areas and / or non-designated areas without exception. This includes common work areas, classrooms, conference and meeting rooms, private offices, elevators, hallways, cafeterias, staff rooms, stairs, restrooms, Trust-owned or leased vehicles and all other facilities. Failure to adhere to this instruction may result in disciplinary action being taken.

Smoking refers to the use of traditional tobacco products. Vaping refers to the use of electronic nicotine delivery systems or electronic smoking devices.

## **18. Drug and Alcohol Misuse**

Being under the influence of alcohol or illegal drugs at work is not permitted. Alcohol and illegal drugs / other banned substances may not be consumed during working hours, including lunchtime and break time.

It is the responsibility of all employees to report to work fit for duty without impairment from alcohol and / or illegal drugs. It is a disciplinary offence for employees to consume alcohol and / or use illegal drugs during working hours or whilst on duty.

Any employee representing the Trust at official functions / meetings, whether within the working day or when attending evening seminars, meetings, etc. are reminded of the need to maintain appropriate standards of conduct at all times.

Where there is a belief that an employee is under the influence of alcohol and / or illegal drugs, their Headteacher will ensure that the employee is escorted home safely and make arrangements to interview them on the next working day.

Employees must also note that many prescribed medications and over the counter medicines can have an adverse effect on the ability to work. Therefore, employees must always check that they can still work safely before taking any drug.

Further information is provided in the Substance Misuse Policy.

## **19. Training Materials and Intellectual Property**

If an employee writes a book or publication for payment on subjects relating to their work for the Trust they must seek the permission, in writing, through the Chief Executive Officer.

The Trust retains intellectual property rights for work undertaken by employees. Research, reports, designs, drawings, software and other developments or similar work, when created in the course of an employee's normal duties, remain the property of the Trust. These should not be removed from Trust premises or passed on to third parties by any employee acting in a private capacity without the express consent of the Chief Executive Officer.

## **20. Patents and Inventions**

Any matter, or thing capable of being patented under the Patents Act, made developed or discovered by an employee, either alone or with others, whilst in the performance of their duties should be disclosed to the Trust through the Chief Executive Officer and, subject to the provisions of the Patents Act, it will belong to and be the absolute property of the Trust.

Employees must not undertake private or personal work, paid or unpaid, of any description in working hours or on Trust premises unless they have been given specific permission by the Chief Executive Officer. Even if approval is granted, any fees received, e.g. lecture fees would be passed over to the Trust.

## **21. Financial Procedure Rules**

All employees involved in financial activities and transactions on behalf of the Trust, including budgetary control, payments of accounts, payments of salaries and wages, petty cash and orders of works, goods or services must follow the Trust Financial Procedures Policy.

Public funds entrusted to them must be handled in a responsible and lawful manner and ensure value for money.



## **22. Gifts, Hospitality, Prizes and Awards**

A potential source of conflict between public and private interests is the offer of gifts, hospitality or benefits in kind to employees in connection with their official duties. It is important to avoid any suggestion of improper influence.

The Trust has a register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgment or integrity and should ensure all staff are aware of it.

The Trust's policy around Gifts & Donations is clearly detailed in the Trust's Financial Procedures Policy (Section 15).

When making gifts, the Trust will ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds. Any gifts made to a school (above the value of £50) must be reported to the Central Team Business Support Officer to enable it to be recorded in the Trust's Gifts Register.

If you are unclear what is acceptable, please refer to the Financial Procedure Policy (Section 15 – Gifts & Donations) or ask your Headteacher or the Chief Financial Officer for further clarity.

## **23. Notification of Criminal Investigations and Other Required Disclosures – Childcare Disqualification**

The code of conduct places a general obligation on all employees to disclose information which is relevant to their capability, capacity and suitability to carry out the duties and responsibilities for which they are employed. This general obligation applies irrespective of the role undertaken by the employee and is not limited to information which relates to a conviction, caution, reprimand or warning.

For employees undertaking roles for which a Disclosure and Barring Service (DBS) check is required there is a specific obligation on them to disclose any convictions, cautions, reprimands or warnings that they receive which are relevant to their employment.

For the avoidance of doubt an employee must immediately inform their Headteacher, if during their employment with the Trust they are:

- Included on the Disclosure and Barring Service (DBS) Children's Barred List
- Disqualified from working with children under The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

- Advised that they are under investigation for a criminal act (including road traffic offences)
- Arrested in connection with a criminal act
- Notified that criminal charges are being considered against them
- In receipt of a summons to appear before a Court of Law for an alleged offence
- Found guilty and convicted of any offence
- Cautioned by the police
- Involved in any other matter which it would be reasonable to think would impact upon their role and or professional standing

**Failure to disclose this information may be treated as a disciplinary offence.**

The Headteacher will consider any possible effects of these matters on an individual's employment, discuss this with HR as appropriate and take relevant action.

After having undertaken a risk assessment and taking advice as appropriate the Headteacher will put in place precautionary measures for the protection of the employee, pupils and the Trust. Precautionary action may include restriction of duties, temporary redeployment, temporary change of work base or, if none of these options are practicable, suspension with pay. The Headteacher is responsible for consulting with authorised officers / legal / HR as appropriate and taking relevant action. Following careful consideration of the available evidence, any action taken will be fair and reasonable in the circumstances.

## **24. Whistleblowing Policy**

The Trust is committed to the highest possible standards of openness, honesty, integrity and accountability. In line with that commitment individuals are encouraged to voice their concerns, on a confidential basis, where any activity falls below these standards or there is suspicion of malpractice or inappropriate activity about the Trust's work and / or concerns about an employees' behaviour.

In order to ensure that this can happen the Trust has adopted a Whistleblowing Policy to encourage and enable employees to raise serious concerns rather than overlooking a problem or 'blowing the whistle' outside.

## **25. Corruption**

Employees must be aware that bribing another person or receiving a bribe are serious criminal offences under the Bribery Act. Penalties include fines and / or imprisonment.

The offence of 'bribing another person' will be committed if an employee offers, promises or gives financial or other advantage to another person with the aim of inducing or rewarding them perform an activity or function improperly, or if they request, agree or accept, to receive a bribe from another person. The activity or function could relate to an external business or commercial activity or any public function.

For an employees' own protection, if anyone makes an approach which seems to them, or might seem to a third party, to be aimed at obtaining some form of preferential treatment, or in any suspicious circumstances in connection with a contract, this should be reported to the Headteacher.

## **26. Contact with the Press and Media**

Employees are not permitted to give reports or speak to the press and media, unless this is an aspect which is clearly required within their role. Employees with this responsibility must guard themselves against declaring a view which is contrary to a position taken by the Trust Board and which may be deemed to be critical of that decision.

Outside of working hours, an employee is entitled to voice their opinion on issues affecting the local community e.g. at a neighbourhood forum. However, employees have a general duty of care to avoid a conflict of interest and should not criticise, damage or act in any way against the Trust.

A Trade Union official or member may be asked to comment by the media on, for instance, an industrial dispute. Any opinion expressed should be clearly given in their capacity as a Trade Union official or member.

Where an employee is invited to give a talk to an outside body, or participate in a broadcast, or contribute an article to a professional journal or the like, on a matter related to their employment or on a personal interest which would be relevant to that employment, the following guidelines apply:

- Acceptance of such an invitation shall be at the discretion of the Trust. In the event of a Headteacher wishing to follow this course of action, it shall be at the discretion of the Chief Executive Officer

and, in the event of the Chief Executive Officer wishing to follow this course of action, the Chair of the Trust Board

- Unless an employee is officially representing the Trust, they should make it clear that they are speaking or contributing on a personal basis and that their views do not necessarily represent those of the Trust Board
- Employees should avoid commenting on matters which could be regarded as contentious or sensitive so far as the Trust is concerned, especially in cases where what is said is being reported

Provided that an employee gives talks on relatively isolated occasions, they shall, at the discretion of the Trust be permitted:

- To retain any fee received (on the assumption that any preparatory work will have been undertaken in the employee's own time)
- To be absent for the purpose of giving the talk, interview etc., without the necessity of taking annual leave, if the invitation entails being absent during working hours, providing the absence from work is reasonable and does not adversely impact on the delivery of education / their work.