

Code of Conduct

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1. Introduction

- 1.1. This code of conduct applies to all Trust employees. Contractors, consultants or agency staff working with the Trust will be expected to abide by the standards and principles set out in the code.
- 1.2. The Code is not designed to act as a prescriptive list of expected standards of behaviour but serves to provide general guidance on how to ensure that actions and behaviour are consistent with the PLTs values and the high standard of conduct required in maintaining public confidence in the services we provide.
- 1.3. The Trust expects all its employees, and those engaged on its behalf, to conduct themselves in a professional and lawful manner. The Trust expects all employees to abide by the following core principles:
- 1.4. You are expected to conduct yourself in a manner both inside and outside work, which upholds the reputation of the Academies and Trust.
- 1.5. Misconduct at work will be dealt with in accordance with the disciplinary policy. Conduct outside of work may also result in disciplinary action if it directly affects the performance of your work or the reputation of the Academy.
- 1.6. You should notify the Headteacher if you are in any doubt about the effect of your conduct outside work. If you are subject to criminal proceedings, you must disclose this to the Headteacher. If any aspect of the information that forms your DBS check or your disqualification by association declaration changes whilst you are in employment with the Trust you are obligated to inform the Headteacher immediately.
- 1.7. Honesty, Integrity, Impartiality and Objectivity
 - Employees must perform their duties with honesty, integrity, impartiality and objectivity
- 1.8. Accountability
 - Employees must be accountable to the Trust for their actions
- 1.9. Respect for Others
 - Employees must treat others with respect and must not unlawfully discriminate against any person
- 1.10. Stewardship
 - Employees must use any public funds entrusted to or handled by them in a responsible and lawful manner
 - Employees must not make personal use of Trust property or facilities unless authorised to do so
- 1.11. Personal Interests
 - Employees must not allow personal interests to conflict with the Trust's service provision
- 1.12. Registration of Interests
 - Employees must comply with the Trust's rules in relation to registering interests and declaring gifts or hospitality received

- 1.13. Reporting procedures
- Employees must not treat colleagues less favourably because they have or because they intend to take action under any of the Trust's reporting procedures, for example under the whistleblowing policy
- 1.14. Openness
- Employees must not disclose information given to them in confidence, or any information acquired of a confidential nature, without the express consent of a person authorised to give it, unless they are required to do so by law
 - Employees must not prevent anyone from gaining access to information to which they are entitled by law
- 1.15. Management of Staff
- Employees who are involved in making appointment or any decisions relating to discipline, promotion, pay or conditions of another employee or prospective employee must take these decisions fairly and impartially
 - Where an employee has any relationship with an employee or a prospective employee, which may cast doubt on their impartiality, they should seek advice from their Headteacher /line manager
- 1.16. Duty of trust
- Employees must act in accordance with the Trust that the public is entitled to place in them
- 1.17. The standards of conduct as set out in this code may also extend to your conduct outside work. Employees have the right to undertake private commitments or activities outside of work, if they so wish. However, where these activities may give rise to a possible conflict of interest or could potentially have an adverse effect on their employment with the Trust, they should declare these activities to their Headteacher /line manager.
- 1.18. The Trust reserves the right to take action against any employee whose actions and/or behaviour, inside or outside work could reasonably be regarded as bringing the Trust into disrepute. This includes the use of social media.

2. Management of staff

- 2.1. The Trust expects integrity and honesty from its employees and prospective employees at all times. Supplying false information or documents, or attempting to deliberately mislead an interview panel could result in disciplinary action being taken against you and may lead to dismissal.
- 2.2. Applicants for posts should not approach or attempt to influence Trust employees outside of the normal recruitment process. Any such attempt will lead to disqualification from the recruitment process and/or disciplinary action.
- 2.3. Where an employee is working in a line management relationship with someone who is or becomes a relative, they must declare this to their Headteacher /line manager, who will then make a decision as to the appropriate course of action.
- 2.4. For the purpose of this Code 'relative' includes:
- Spouse/partner
 - Parent/parent-in-law

- Son/step son
- Daughter/step daughter
- Brother/sister
- Grandparent
- Grandchild
- Uncle/Aunt
- Nephew/niece
- Child of a partner

- 2.5. Relatives will also include the spouse or partner of any persons named above.
- 2.6. You will be required to provide up to date contact details, which will be kept on your personnel records. As an employee of the Trust you are responsible for ensuring that the Trust always holds up to date contact details for you and your next of kin.

3. Working with vulnerable clients

- 3.1. The Trust takes very seriously its responsibilities towards the disadvantaged and vulnerable members of the community, in particular children, older persons and disabled persons.
- 3.2. Trust employees are expected to take additional care in dealing with the more vulnerable members of the community and must therefore do nothing which may:
- damage public confidence in your motives
 - damage public confidence in your integrity as an employee
 - bring the Trust into disrepute.
- 3.3. The Trust has a legal obligation under the Protection of Children Act 1999 and the Care Standards Act 2000 to carry out checks for convictions, whether spent or not, where we propose to offer an individual a position working with vulnerable persons. This obligation also extends to existing employees who are moving into such a post.
- 3.4. Employees, whose employment is subject to a Disclosure Barring Services (DBS) disclosure, will be required to renew their DBS disclosures on a three-yearly basis to ensure that the Trust are complying with its obligation to safeguard its vulnerable client group. Employees are also required to renew any other membership to a professional body that is a specific requirement of their job. The cost of which will be met by the employer.
- 3.5. Failure to comply with a management/HR request for DBS renewals, or any other professional membership renewal, may be considered a disciplinary offence and will be dealt with under the Trust's disciplinary procedure. Where this occurs, employees may also be suspended from their duties.

4. Disclosure of criminal convictions

- 4.1. Employees are required to declare any convictions or bind overs received during the course of their employment to their Headteacher /line manager (or in exceptional circumstances someone more senior) at the earliest possible opportunity. Employees should also declare any cautions received during the course of their employment if they relate to fraud or theft, or relate to any matter which would directly or indirectly relate impact on their responsibilities with regard

to children, young persons or vulnerable adults, or if it is likely that the conduct for which the caution was received would bring the Trust into disrepute, taking into account the employee's work within the Trust. In the event that an employee is unsure whether to disclose a caution or not they should contact their Headteacher / Line Manager or Human Resources in confidence to discuss the matter. Failure to declare any such conviction, bind over or relevant caution, for whatever reason, may be regarded as gross misconduct under the Trust's disciplinary rules.

- 4.2. Candidates who have been shortlisted for interview are required to declare any relevant convictions, adult cautions or other matters which may affect their suitability to work with children. As a result of amendments to the Rehabilitation of Offenders Act 1974 (exceptions order 1975) in 2013 and 2020, some minor offences are now protected (filtered) and should not be disclosed to potential employers, and the Trust cannot take these offences into account. If applicants are unsure whether they need to disclose criminal information, they should seek legal advice or you may wish to contact Nacro or Unlock for impartial advice. Guidance and criteria on the filtering of these cautions and convictions can be found on the Ministry of Justice website.

5. Respect for others

- 5.1. The Trust demands a very high standard of conduct from all its employees at all times, particularly when interacting with colleagues and members of the public. Language or behaviour that is rude, offensive, threatening, violent or abusive will not be tolerated from any employee.
- 5.2. Members of the public have the right to expect courtesy and co-operation at all times. As a Trust employee you must:
 - treat others with respect
 - not discriminate unlawfully against any person and
 - treat members and co-opted members of the Trust professionally
- 5.3. If you are an employee who is in receipt of any of PLT services, you should not expect or seek preferential treatment in the event of any enquiry about any service(s) provided to you by the Trust.
- 5.4. Employees must not improperly use any information gained in the course of their employment for their personal gain or to advantage or disadvantage anyone known to them.

6. Equalities in employment

- 6.1. Employees are expected to conduct themselves in line with the Trusts Zero Tolerance Statement, which outlines the Trusts commitment to eliminate harassment or discrimination and fulfil the requirements of the Equality Act.

7. Accountability

- 7.1. All employees of the Trust are expected to work diligently and to contribute positively to the daily tasks of the Trust in the provision of services. You must therefore undertake your duties as outlined in your job description to the best of your ability and must abide by the terms of your contract of employment. You must

comply with all legitimate instructions from your Headteacher /line manager and with all operational procedures and regulations.

- 7.2. As an employee you are accountable to the Trust for your actions.
- 7.3. If you are a manager, you will be responsible for setting an example to employees in the application of this code. You must ensure that you familiarise yourself with all the Trust's employment policies and procedures and apply them in a non-discriminatory way. You will be responsible for communicating expected standards of conduct to the employees in your work area, advising them of any particular rules which may apply.

8. Writing & speaking to the public/media/other agencies

- 8.1. Employees must not make any public statement on behalf of the Trust or engage in communication with the media in regard to any employment or service matter, without the express consent of their Headteacher. All enquiries from the press must be referred to the Headteacher.
- 8.2. Only Headteachers may provide an employment reference on Trust headed paper. If an employee provides a personal reference for a colleague or former colleague, they must make it clear that they are doing so in a personal capacity only.

9. Health and safety

- 9.1. Responsibilities
 - 9.1.1. All employees have a responsibility, under the Health and Safety at Work Act, to take care in undertaking your duties. It is your responsibility to wear protective clothing and use any safety equipment, which is issued to you. You must report any accident/incident that you have at work and report any health and safety risks to your Headteacher/line manager without delay.
 - 9.1.2. If you are a manager, you also have a responsibility for the health and safety of your staff, taking all reasonable steps to ensure that all activities are carried out with due regard to the Trust's Health and Safety policy.
- 9.2. Alcohol, illegal drugs and substance misuse
 - 9.2.1. Alcohol, drugs and substance misuse impairs judgement and can put you, work colleagues and members of the public at risk. Abuse of any such substance whilst you are at work may be treated as a disciplinary offence, and will be dealt with accordingly.

10. Outside commitments, personal interests, and working for outside bodies

- 10.1. Your time outside working hours is your own personal concern. However, you must not put yourself in a position where your job and your personal interests' conflict. Where the slightest doubt exists, and where there is a potential conflict of interest, employees are advised to either decline acceptance of outside work or membership of an external body or organisation, or to seek the advice of their Headteacher /line manager before accepting any such outside work.

- 10.2. It is important for employees to discuss their intention to undertake any other employment with their Headteacher /line manager or any intention to become a member of an external organisation, (whether appointed as the official Trust representative on the outside body or otherwise), particularly if they have doubts or concerns, in order that any involvement with the Trust and any conflicts of interest can be identified and assessed. This will help to protect the employee should any question of conflict of interest arise subsequently.
- 10.3. Headteachers should check with their staff whether employees have existing arrangements of which they are unaware and should seek to review the position in relation to membership of outside bodies and/or outside employment at least annually to ensure that a conflict of interest has not arisen where no conflict existed previously.
- 10.4. Employees must exercise great care and diligence when undertaking paid or unpaid work outside the Trust. Any paid or unpaid work undertaken should not conflict in any way with their Trust duties or make use of material to which the employee has access by virtue of his or her position. Employees must not in their official capacity allow their personal interests to conflict with the Trust's requirements or use their position improperly to confer an advantage or disadvantage on any person.
- 10.5. Employees must declare any activity, relationship or other personal interests, whether financial or non - financial, where they may be a conflict of interest between their Trust duties and their private interests. Employees will also be required to declare personal or business interests which may, or may be perceived to, influence their judgement; this includes membership of organisations/outside bodies where conflicts may arise or any organisation which may seek to influence the policies of the Trust, for example a local campaigning group (but excluding any representative body or professional body membership).
- 10.6. Employees must declare membership of any organisation which is not open to the public without formal membership and commitment of allegiance and which has secrecy about rules, membership or conduct, for example, Freemasons.
- 10.7. You must not do private work during your Trust work time or whilst you are on sick leave.
- 10.8. The Trust will not prevent employees from undertaking additional employment (paid or unpaid) outside working hours provided it does not conflict with the law, the Trust's interests or in any way weaken public confidence in the Trust. You are required to notify the Trust in writing before undertaking any other employment and must declare any voluntary or unpaid work. All Trust employees are specifically required to obtain consent in writing from their Headteacher/line manager in advance, on each occasion, if they wish to engage in any other business or take up additional employment.
- 10.9. Many employees undertake valuable voluntary work in the community in their own time and the Trust supports this. However, any significant interest in an organisation must be declared, for example, acting as a member of the management committee of a charity) where the Trust has some involvement with the organisation. If in doubt the employee should discuss the matter with their Headteacher/line manager.

- 10.10. Employees must conduct themselves at all times in a manner which is consistent with their obligations under the Code of Conduct when carrying out any external activities so as to avoid bringing the Trust into disrepute.
- 10.11. Employees should avoid putting themselves in a position where their involvement in a local community group puts them, or could reasonably be perceived as putting them, in a position where their involvement is in direct conflict with the best interests of the Trust or is likely to bring the Trust into disrepute. In these circumstances an employee must consider whether it is in the best interest of the Trust for them to remain involved with the external organisation.
- 10.12. The Trust will not unreasonably require an employee to cease or refrain from other work/employment unless there is a conflict of interest, or there is a reasonable belief that the physical or mental demands of the other work have a damaging effect on the employee's ability to carry out their normal duties for the Trust.
- 10.13. An employee who fails to declare any personal interests as described above may be subject to disciplinary action being taken against them. Any employee who is in doubt as to whether or not specific outside interests exist and should be declared, should contact HR for guidance
- 10.14. Examples of circumstances where there is potential for a conflict of interest to arise would include:
 - A teacher who is also running a private teaching or tutoring business while working at the Trust.

11. Political neutrality

- 11.1. The Trust recognises that employees are entitled to undertake whatever political activities that they wish. However, these must be done outside employee working hours. The Trust expects all employees to carry out their roles without political bias and treat every decision on its merits and not on any other bias.

12. Gifts and hospitality

- 12.1. You should not accept bribes, hospitality or gifts that are offered to you by any organisation or person able to provide work, goods or services to the Trust. Similarly, where you are in a position to influence, you must not show favour to anyone in connection with Trust's business.
- 12.2. You will be required to record all gifts and hospitality offered irrespective of whether you have accepted it or not.
- 12.3. All employees are forbidden to ask for tips or any payment for service or goods provided except through the Trust's official invoice systems.

13. Sponsorship – giving and receiving

- 13.1. Where an organisation wishes to sponsor or is seeking to sponsor a Trust activity whether by invitation, tender, negotiation or voluntarily, the basic guidelines concerning acceptance of gifts and hospitality apply.
- 13.2. Where the Trust wishes to sponsor an event or service, neither an employee nor any partner, spouse or relative must benefit from such a sponsorship. Similarly,

where the Trust gives support in the community, through sponsorship, grant aid, financial or other means, and employees should ensure that impartial advice is given and that no conflict of interests exists.

14. Procurement

14.1. Placement of contracts

14.1.1. If you are required to buy or sell any item or service as part of your duties, you must act in accordance with the rules and regulations as set out in the Trust's procurement guide and with any specific instructions in use.

14.1.2. All relationships of a business or private nature with contractors, or potential contractors, should be made known to the Headteacher. If you know you have any interest in any contract which the Trust has entered into, or proposes to enter into, you are required, by law, to declare your interest to your Headteacher immediately.

14.2. Separation of roles during tendering

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

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

14.2.3. Confidential information on tenders or costs for internal or external contractors should not be disclosed to any unauthorised party or organisation

15. Working with the Trusts property and money

15.1. Use of Trusts equipment/facilities

15.1.1. Generally, employees must not use Trust time or facilities, for example, IT equipment, telephones, vehicles or any other Trust property in connection with any outside work or activity (paid or unpaid), without the written permission of their Headteacher. The misuse or unauthorised use of Trust property may result in disciplinary action being taken against an employee.

15.1.2. There is separate guidance on the use of the Trust's computer, e-mail and internet facilities and all employees should abide by this guidance at all times in relation to any work undertaken inside or outside the Trust.

15.2. Use of financial resources

15.2.1. Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner, ensuring value for money to the local community and avoiding legal challenge to the Trust.

15.2.2. Anyone responsible for managing a budget within the Trust, must request a virement where they are forecasting overspends, to secure an increase to their budgets. (virement = the process of transferring items from one financial account to another)

15.2.3. Budget holders who overspend significantly without alerting the Trust may be subject to disciplinary action in accordance with the Trusts disciplinary rules.

15.3. Overpayment to employees

15.3.1. Where it occurs that you are receiving an overpayment in salary, allowances or overtime, it is your responsibility to notify your Headteacher/line manager as soon as possible after becoming aware of the overpayment, in order to make arrangements for repayment. The Trust reserves the right to take steps to recover any overpayment of salary.

15.4. Debt to the Trust

15.4.1. Employees are required to set a good example by not allowing themselves to become indebted to the Trust.

15.5. Theft from the Trust

15.5.1. Stealing from the Trust, its clients or fellow employees will not be tolerated. Waste, loss, fraud, unauthorised use or wilful negligent damage to Trust property are considered as gross misconduct and may result in your dismissal from the Trust. Therefore, employees:

- must not steal or remove without authorisation money or property from the Trust, its clients or colleagues
- must carry out their duties with care, particularly when handling the Trust's money or property (including papers)
- must not take responsibility for money or property unless it is part of their official duties
- must not use equipment including computers, Trust vehicles, telephones, or money for any unauthorised purpose
- must not copy Trust computer software for their own use
- must not take Trust equipment home without the express permission of their Headteacher /line manager.

15.6. Ownership of Intellectual Property/Copyright

15.6.1. Employees should be aware of the rules on the ownership of intellectual property or copyright created during their employment. "Intellectual Property" is a wide term which includes inventions, creative writings and drawings. As a general rule, any Intellectual Property created by an employee during the course of their employment with the Trust belongs to the Trust and as such must not be used by the employee in relation to any work performed outside the Trust, including work undertaken after the conclusion of their employment, without the express consent of the Trust.

16. Disclosure of information

16.1. The law requires that certain types of information must be made available to Members, auditors, government departments, service users and the public. The Freedom of Information Act, for example, requires disclosure of certain information in response to written requests, whilst the General Data Protection regulation (GDPR) requires that the Trust comply with statute in relation to the handling and processing of personal data. If you are in doubt guidance should be sought from your Headteacher /line manager before disclosing information.

17. Whistleblowing

- 17.1. The Trust has a duty to ensure that there is no malpractice in any of our operations.
- 17.2. The Whistleblowing Policy covers any significant concerns that an employee may have about malpractice in any aspect of service provision or the conduct of Officers, Members, Contractors or other agents of the Trust.
- 17.3. This procedure is not an alternative process for raising concerns or grievances over managerial decisions or other matters for which there are appropriate existing procedures within the Trust.

18. Low Level Concerns

- 18.1 Staff refers to all those working for or on behalf of the Academy, full time or part time, temporary or permanent, in either a paid or a voluntary capacity.

Safeguarding Lead refers to the Designated Safeguarding Lead.

KCSIE refers to the DFE statutory document Keeping Children Safe in Education.

A Low-Level Concern (LLC) refers to any concern, no matter how small or even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- Is not consistent with the PLT Code of Conduct, and/or;
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such behaviour is included in section 4.10 of KCSIE and are as follows but not limited to:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Using inappropriate sexualised, intimidating or offensive language.

An Allegation is when an alleged person who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child; or
- Possibly committed a criminal offence against or related to a child; or,
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

18.2 The Importance of sharing a low- level concern

As defined above, a low-level concern is any concern about an adult's behaviour towards a child that does not meet the threshold set out above, and therefore may not require a referral to LADO.

Employee's do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once an Employee shares what they believe to be a low-level concern that determination should be made by the Headteacher/ Principal.

It is important to share any concern with the Headteacher / Principal and DSL to ensure the safeguarding of the children and young people within our schools.

18.3 Responding to a low level concern:

Upon receipt of the low-level concern the Headteacher / Principal or the DSL must then:

- Speak to the member of staff who has raised the concern to gather all information;
- Review the information and determine if the behaviour is:
 - (i) Consistent with the PLT Code of Conduct
 - (ii) Constitutes a low-level concern
 - (iii) Is serious enough to consider a referral to LADO
 - (iv) If considered with any other previous low-level concerns raised, it may be reclassified as an allegation and referred to LADO/ Other external agencies
- If the Headteacher / Principal / DSL has any doubt, the DSL should seek advice from LADO on a no-name basis if necessary;
- The Headteacher / Principal / DSL must not speak to any other members of staff without having consulted the Head of Safeguarding and the Trust HR team. If a LADO referral is to be made, the Headteacher / Principal / DSL must not speak to any members of staff without LADO's agreement.
- Subject to the further information gathered, if appropriate the matter may be managed in accordance with the PLT Disciplinary Policy or the Management of Safeguarding Allegations Policy.

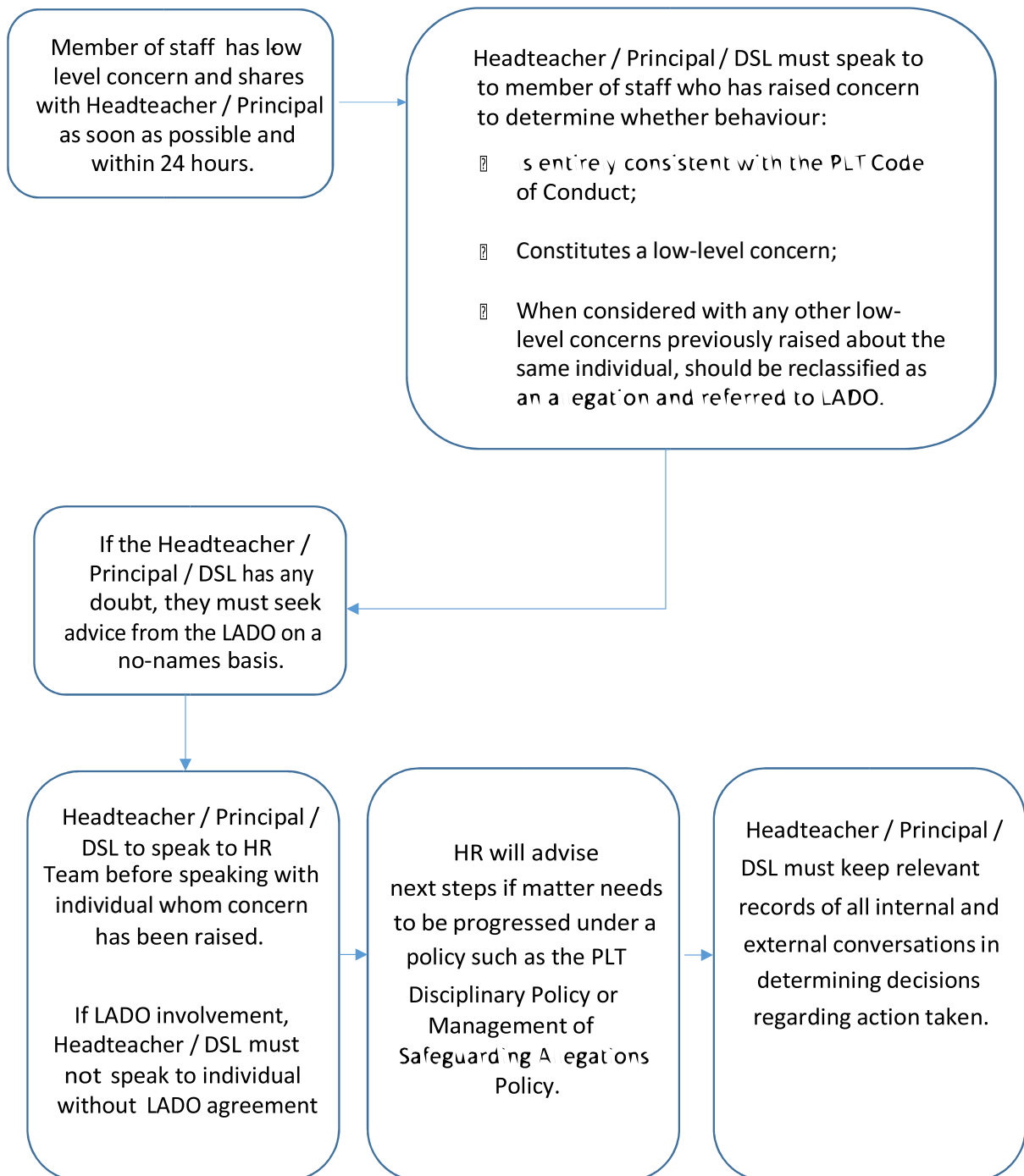
18.2 **Record Keeping:** All low-level concerns should be recorded in writing by the Headteacher / Principal / DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Safeguarding Lead and, where appropriate, the Trust Head of Safeguarding, should decide on a course of action, either through the Disciplinary procedure or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Information regarding low level concerns will be retained in line with the Trust retention policy.

- 18.3 **References:** In accordance with part three of KCSIE, only substantiated safeguarding allegations should be referred to in references. Low-level concerns must not be included in references, unless they relate to issues which would normally be included in a reference, for example misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Appendix 1 - Flow map for raising a low-level concern



Appendix 2- Low-Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’, that an adult may have acted in a manner which:

- Is not consistent with the PLT Code of Conduct, and/or;
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Please provide a concise record, including brief context in which the low-level concern arose, the details in a chronologic order, and as precise and accurate as possible. Please use a separate sheet if necessary.

This record should be signed, timed and dated.

Name of Employee:	Role: School:
Details of Concern:	

Signed:	Time & Date:
Received by:	At (Time): On (Date):
Action Taken:	