

# City of London Academies Trust

## Code of Conduct



Responsibility:	Director of Human Resources
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## **1. Introduction**

- 1.1 In performing their duties, City of London Academies Trust (CoLAT) employees must act with integrity, honesty, impartiality and objectivity. The public is entitled to expect the highest standards of conduct from all CoLAT employees.
- 1.2 This Code is to be given to existing employees at the start of each academic year and new employees when they commence employment. If employees have any doubts or queries about what acceptable conduct is, or about anything else in this Code, they should, in the first instance, raise these with their direct line manager or the Principal/Headteacher of the academy in which they work.

## **2. Trust Ethos/Vision**

- 2.1 The Trust is characterised by:
  - High expectations, aspirations, excellence and a belief that all can succeed;
  - Combining creativity, innovation and enterprise, alongside tradition and continuity;
  - Developing people who are confident, resilient, compassionate and democratic.
- 2.2 This code of conduct is a set of explicit expectations, based on these characteristics and the Trust's five foundations of excellence:
  - high expectation leadership
  - exemplary behaviour
  - exceptional teaching
  - a challenging curriculum
  - assessment that informs intervention
- 2.3 The code supports and promotes behaviours which align to the core CoLAT values of:
  - Integrity
  - Professionalism
  - Care

## **3. The Purpose of the Code and its status**

- 3.1 The Code sets out the core values for acceptable standards of behaviour by employees and the consequences of any failure to meet the standards. It aims to ensure:
  - employees are clear about the Trust's standards and expectations of them
  - employees deal appropriately with difficult and/or potentially compromising situations
  - employees recognise their individual, collective and corporate responsibility to promote and encourage high standards of conduct
  - that the pupils and each academy community receive the best service
  - that each academy community is treated respectfully at all times
  - improved management of the Trust, each academy and its services
- 3.2 The Code sets out the professional standards expected and the duty upon employees to abide by it. All Adults have a duty to keep pupils safe, promote their welfare and, to protect them from radicalisation (the Prevent duty), abuse (sexual, physical and emotional), neglect and safeguarding concerns. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by adults that demonstrates integrity, maturity and good judgement. Following this Code will help to safeguard Adults from being maliciously, falsely or mistakenly suspected or accused of misconduct in relation to pupils
- 3.3 This Code cannot encompass all expectations of the Trust. Its successful operation depends on employees' loyalty, honesty, competence, integrity, professionalism, and sound judgment. It is therefore expected that all employees will work to the guidelines, stipulations and spirit of this code.
- 3.4 Principals and Headteachers have a particular responsibility to make sure that employees are aware of the Code and its requirements, including its implications for their duties and that working arrangements, practices and policies support and are compatible with the Code.

- 3.5 The Code forms part of employees' contracts of employment and any breaches of the Code may result in action being taken under the relevant Trust procedures; for example, misconduct, criminal convictions, and competence.
- 3.6 In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards' and, in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.
- 3.6 Employees are expected to comply with the Code in all aspects of their work and in their lives outside work insofar as they may compromise their employment by the Trust.
- 3.7 The Code does not place restrictions on employees' trade union activities, provided that these are reasonable, authorised by senior trade union branch officers, and are within the trade union facilities agreement.
- 3.8 The Code refers to a number of Trust and academy policies and procedures in respect of behaviour and the ways in which employees are required to work. Employees should refer to these for greater details on matters referred to in the Code.

#### **4. Who is covered by the Code**

- 4.1 The Code applies to all employees of the City of London Academies Trust.
- 4.2 The Trust also expects that anyone it engages or contracts to carry out any of its functions will abide by the spirit of the Code. These include:
- Trust members
  - Trustees
  - Members of local governing bodies
  - Employees of the City of London Corporation and members of the Education Board
  - Consultants and their employees
  - Contractors and their employees
  - Employees of other organisations who have been seconded to work for the Trust
  - Agency staff
  - Volunteers and individuals undertaking work placements or apprenticeships or similar roles
- 4.3 In the event that the Code is breached, consideration will be given to terminating, or seeking compensation under the contract or other arrangement between the consultant/contractor/outside organisation and the Trust, and/or referring the matter to the police or other relevant regulatory body, dependent on the circumstances.

#### **5. Standards, service delivery and equality**

- 5.1 In addition to high levels of performance, a good image is vital for the Trust and each academy so that its residents and businesses can have confidence in the services provided.
- 5.2 As public servants, CoLAT employees have a particular responsibility to look after public resources and property and their conduct inside and outside work must never undermine the trust and confidence the public and the Trust need to have in them to carry out their work properly and conscientiously.
- 5.3 All employees who work in academies set examples of behaviour and conduct which can be copied by pupils/students. All employees must, therefore, demonstrate high standards of conduct in order to encourage our pupils/students to do the same.
- 5.4 Employees are the Trust's "ambassadors". It is therefore vital, that the public finds them polite, competent, professional, friendly, helpful and trustworthy.
- 5.5

## **High standards**

- 5.6 At all times employees are required to:
- give the highest possible standard of service to the Trust and each academy community and make service delivery their main priority.
  - Do nothing inside or outside their working hours which could undermine public confidence in them as Trust employees and/or in the Trust.
  - Work in the best interests of the Trust and the communities it serves.
  - Do nothing which results in the Trust (or any other public authority) being denied revenue to which it is entitled.
  - Follow Trust and individual academy policies and procedures and meet laid down standards.

## **Equality Issues**

- 5.7 CoLAT is an equal opportunities education provider and employer. No form of discrimination is tolerated. All CoLAT employees have a responsibility to promote and comply with the Trust's equal opportunities policies and practices and with the requirements of the law.
- 5.8 CoLAT employees are required to:
- Make sure that the Trust's equality policies are complied with and carried out.
  - Treat all members of the community, parents, pupils and other employees fairly and equally regardless of their sex, race, colour, national or ethnic origin, sexuality, religion, age, disability or marital status.
  - Assist all members of the community, parents and pupils so that they can benefit from the services on offer.
  - Never display in the workplace, nor allow others to display, sexist or racist material, or material which would normally be considered offensive.
  - Tell their line manager or Headteacher/Principal about anything which may be discrimination, bullying and harassment or victimisation of themselves, colleagues, parents, pupils or members of the community.
- 5.9 The Principal/Headteacher in each academy has a particular responsibility for making sure that:
- Services are delivered in a manner which effectively meets the Trust's and academy's equality policies and that all groups within the community have equal access.
  - Employees, pupils and parents can enjoy an environment which is free of any discrimination the Principal/Headteacher is informed about any incidents and/or complaints about discrimination, victimisation, or harassment.

## **Attendance and Punctuality**

- 5.10 Employees must report promptly at the appointed time at their designated workplaces, at the start of their working day and after any authorised breaks.
- 5.11 Employees who are prevented from reporting for work because of illness and/or injury must comply with the sickness notification/certification requirements detailed in their contracts of employment, academy policy and/or as directed by their Principal/Headteacher.
- 5.12 Employees must arrive in good time in order to begin work promptly. Employees are expected to be punctual in relation to all appointments and engagements unless there are exceptional circumstances. Lateness for appointments with people who do not work for CoLAT reflects badly on the Trust.
- 5.13 Principals/Headteachers must make sure that proper arrangements are in place for employees to record their start and finish times at work and their whereabouts.

## **Criminal Convictions/ Charges/ Investigations**

- 5.14 CoLAT employees must:

- In line with Keeping Children Safe in Education, show their original DBS certificate to the Trust before they take up post as well as any DBS re-checks required.
  - Keep the Principal/Headteacher of their academy informed of progress if they are investigated and/or charged in connection with a criminal offence.
  - Tell their Principal/Headteacher immediately if they are convicted of any criminal offence, bound over, or cautioned about activities inside or outside work, including road traffic offences which lead to a conviction.
- 5.15 All COLAT employees, Trustees and Local Governing Body Members are required to report any criminal activities by colleagues over the course of their tenure with the Trust.
- 5.16 Dependent on the duties of the post, employees are also required to declare whether they or anyone with whom they share a household, are disqualified from working in, or being concerned in the management of, the early year and later years' settings as defined in the Childcare (Disqualification) Regulations.

### **Behaviours and Dispute Resolution**

- 5.17 The way employees behave at work directly affects the service, colleagues, the workplace, and the public's perception about CoLAT.
- 5.18 All staff will endeavour to have open, positive, professional working relationships with each other. If and when disputes occur staff should attempt to communicate concerns openly, honestly, and sensitively in a private forum. If no resolution can be found then a further, face to face meeting with the support of a colleague, or manager, may be required.
- 5.19 Where every attempt has been made to resolve disputes informally, but resolution has not been reached, colleagues should consult the Trust's Grievance Policy and Procedure to reach resolution.
- 5.20 Where there is a report of bullying and/or harassment this will be immediately managed in accordance with relevant Trust HR policies and procedures.
- 5.21 Employees must always:
- Show respect for the Trust's communities, public and colleagues and behave in a way which cannot reasonably cause offence.
  - Exercise self-control - never behave in an aggressive and angry manner, nor use foul or abusive language.

### **Dress**

- 5.22 As part of the ethos of the Trust staff should always present a positive and professional image.
- 5.23 The manner in which employees present themselves at work directly affects the Trust's image and should be appropriate for the work they are carrying out for the Trust. Therefore, employees are required to:
- Be clean, tidy, presentable and professional at all times and comply with the requirements of their workplace in relation to appropriate dress for their service and work role.
  - Always wear uniform or protective clothing if these have been issued, or made available for particular tasks, and make sure that these are clean and in good repair.
  - Always have regard to the health and safety implications of what they wear e.g. wear protective clothing.
- 5.24 Employees may follow the traditions of their ethnic/cultural/religious background provided they are safe and appropriate to the job.
- 5.25 Employees may be asked to remove excessive piercings and jewellery, or cover tattoos, while at work. This is to promote the ethos of the Trust and each academy and present a positive and professional image to all our students at all times. The Principal/Headteacher will discuss this with the Employee.
- 5.26 The Principal/Headteacher/Line Managers and Middle/Senior Leaders must:

- Explain to all employees the importance of being dressed appropriately i.e. presenting a positive and professional image, as part of creating a productive and aspirational work environment.
- Meet with employees if s/he is not dressed in a way which presents a positive and professional image. If this is not resolved satisfactorily, then the Trust/academy may use the disciplinary policy.

### **Name badges / Lanyard ID**

5.27 Employees must always wear the name badge or Lanyard ID provided at work, ensuring it is clearly visible at all times.

### **Driving**

5.28 Employees who have to drive in the course of their work must:

- Drive in accordance with the Trust Driving for Work policy
- Always drive courteously and according to the laws and rules of the road.
- Always make sure that vehicles are roadworthy, well-maintained, appropriately insured, taxed, and suitable for the purposes for which they are being used.
- Immediately advise the Headteacher/Principal/Line manager if they are stopped by the police whilst driving, are involved in a road traffic accident or incurring a parking ticket in the course of their work duties.
- Advise their manager of any health issues which may affect their driving.
- Ensure they are familiar with and comply with the updated Highway Code.

### **Smoking**

5.29 All employees are required to comply with the requirements of the law and with the Trust's No Smoking Policy. The legislation makes it illegal to smoke in all public enclosed or substantially enclosed area and workplaces and the Trust's No Smoking Policy also includes vaping and e-cigarettes.

### **Alcohol, Drugs and Substance misuse**

5.30 It is the Trust's policy that employees must not consume alcohol or take drugs (other than prescribed or over the counter drugs) during working hours (including lunchtimes and other breaks) and must not work under the influence of either of these.

5.31 Employees should not present themselves at work drunk or under the influence of alcohol or drugs such that their performance is diminished or otherwise unacceptable. This includes committing a drink or drug offence which could endanger anyone's safety or diminish confidence in the employee's suitability for continued employment.

5.32 Employees must consult their GPs for advice on the effects any legal medication may have on their ability to perform or conduct themselves at work and advise the Principal/Headteacher accordingly.

5.33 Employees must inform the Principal/Headteacher if they have a genuine reason to believe that a colleague may have an alcohol, drug or substance misuse problem.

5.34 Employees must ensure that alcohol is not to be consumed or stored on the school premises unless under the authorisation of the Principal/Headteacher, for example for end of term social events.

### **Health and safety**

5.35 All Employees must:

- Carry out their work in a safe and proper manner having regard at all times for their own health and safety and that of colleagues and the public.
- Be familiar with health and safety law, which is displayed in all workplaces, and the Health and Safety Policy and Procedures of the academy in which they work.

- Comply with the health and safety regulations and any risk assessment relating to the particular task(s) they are carrying out.
- Complete the health and safety training applicable to their jobs.

5.36 The Principal/Headteacher/ Line Manager must make sure that their employees work in a safe place, with safe methods, and must be familiar with their academy's Health and Safety Policy and Procedures and their responsibilities within it.

## **6. Communication, internet and social media**

- 6.1 All employees must read, understand and follow the Trust's IT Acceptable Use Policy and sign up to the Acceptable Use Agreement.
- 6.2 The Trust defines Social media as digital platforms and applications that enable people to create, share, and interact with content, as well as to connect and communicate with others in real time or asynchronously.
- 6.3 Each academy may have additional email and internet policies and guidelines. Employees must read and sign up to these before they use email and the internet.
- 6.4 Communications may be intercepted where appropriate, in line with Trust policy. This may include monitoring (and recording) of telephones, the internet and e-mail.
- 6.5 E-mail is a quick and effective communication tool; however, it must be used professionally and judiciously. E-mail should not be used when the more professional avenue is face-to-face communication. Whole staff e-mails and 'reply to all' functions should only be used when appropriate. Do not send emails to those who do not require the information and be mindful of any information included in email trails. Care must be exercised when using external e-mails to ensure spelling and grammar is acceptable and that the e-mail is always professional and courteous.
- 6.6 The use of WhatsApp messaging or other instant messaging applications to discuss matters in relation to students or colleagues is not acceptable, even if during school hours and using COLAT phones.

### **Internet, phone and safe computer use**

- 6.7 All employees must:
- Familiarise themselves with the Trust's IT Acceptable Use Policy.
  - Take all reasonable steps to prevent students having access to their details on social networking sites, such as Facebook, Twitter/X, Instagram, Snapchat etc. (this list is not exhaustive).
  - Not access Facebook or any other social networking pages of our students or accept students as 'Friends'.
  - Not make derogatory remarks about the Trust, academy, management, colleagues, pupils, or other members of the academy community, on social networking sites such as Facebook, Twitter/X, Instagram, Snapchat etc. (this list is not exhaustive).
  - Always lock their computer if required to leave the computer unattended; Never leave a logged-on computer unattended. Never use a computer that is logged on as someone else.
  - Not allow students to have access to their mobile phone number or to their mobile phone.
  - Not contact students via their mobile phone, but only through their parents' contact details.
  - Not use their personal mobile phone in school other than in the staffroom or office spaces.
  - Never give students their personal email address or contact students using their personal email.
  - Not use personal phones to discuss matters in relation to students including phone calls, text messages, emails, and WhatsApp messages (this list is not exhaustive).
- 6.8 It is not appropriate to use mobile phones in public areas of any academy. They should only be used in the staff room and in designated staff work bases.
- 6.9 It is a gross misconduct offence to surreptitiously record colleagues and students.

- 6.10 All staff have access to the server and ICT services at their workplace. On logging in, all users agree to accept the Trust Acceptable Use policy. It is important to remember that whatever activity the staff are using ICT for, staff are borrowing school equipment.
- 6.11 The Trust will monitor usage and traffic across the system.
- 6.12 Meeting which requires a record will be done so through a clerk. The recording of meetings is not permitted.
- 6.13 Covertly recording meetings or individuals, without their knowledge or consent, is not permitted. Any such action will lead to formal disciplinary action.

### **Media, social media and reputational risk**

- 6.14 Staff must exercise the highest degree of professionalism and discretion in all online activity, public communication and published material (including published articles, blogs, social media posts and comments), whether conducted during or outside of working hours.
- 6.15 Staff must not publish, post, share or engage with material that:
- Compromises the impartial political standing of the Trust or its Sponsor.
  - Damages, or risks damaging, the reputation of the Trust, its academies or the Sponsor. This includes commentary, articles or posts that are malicious, sensitive or overtly politically charged.
  - Causes concern regarding their suitability to work with children and young people.
- 6.16 Staff are reminded that posts made in a personal capacity or outside of work time may be deemed damaging if they can be reasonably linked back to their professional role.
- 6.17 Breaches of these points will be treated as disciplinary matters. Staff misconduct of this nature, particularly in relation to reputational damage, will be subject to processes according to the Trust's Disciplinary Policy. Consequences may lead to formal disciplinary action, up to and including a finding of Gross Misconduct and termination of employment.

## **7. Child Protection and Pupil/Student development**

- 7.1 It is the responsibility of all employees to safeguard and promote the welfare of children and young people.
- 7.2 The Trust and each academy is committed to providing an environment where children can play, learn, develop and achieve and where they are safeguarded and are enabled to tell or communicate if they are being harmed in some way. The Trust and each academy is committed to ensuring that all staff are sensitive to issues of race, culture, gender and diversity ensuring these issues are never a barrier to sharing and reporting concerns about children.
- 7.3 All Adults working with children have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their colleagues, pupils and the public in general. An Adult's behaviour or actions, either in or out of the workplace, must not compromise her/his position within the work setting, or bring the Trust into disrepute
- 7.4 All employees including, temporary and supply staff, volunteers and staff working on site employed by other services and agencies have a statutory responsibility to safeguard and promote the welfare of children and must be aware of and fully conversant with the relevant Trust and academy policies and procedures (Safeguarding/Child Protection Policy).
- 7.5 All employees (including, temporary and supply staff, volunteers and staff working on site employed by other services and agencies) must be familiar with and act in accordance with Part 1 of the most recent update of Keeping Children Safe in Education DfE (statutory), Working Together to Safeguard

Children March 2015 HM Government (statutory), Prevent Duty Guidance July 2015 HM Government (statutory), 'The Prevent duty departmental advice for schools and childcare providers' DfE June 2015 and 'Guidance for safer working practice for those working with children and young people in education settings' October 2015 (non-statutory).

- 7.6 In all instances where you have a concern about a child's well-being, no matter how trivial you may feel it may be, it is your duty to report this concern in line with the Trust's Safeguarding Policy. If you are unsure who to tell, then see your immediate line manager for guidance.
- 7.7 Employees must not transport, or offer transport to, students in their car or other personal vehicle, unless authorised by the Headteacher/Principal.
- 7.8 Employees must never leave students unattended in rooms. Always lock classrooms when you have left the room and make sure you or an adult is the last to leave. If you discover an unlocked classroom or office, please lock it, and report it to the office.
- 7.9 Employees must only use staff toilets, and students must only use student toilets. Adult visitors must only use the staff toilets, and child visitors must only use student toilets.
- 7.10 Child Protection training will be delivered as part of each academy's training programme and developed to meet the needs of the academy. This will take place at the beginning of each academic year and updates provided accordingly.
- 7.11 Employees must not demean or undermine pupils, their parents or carers, or colleagues.
- 7.12 Employees must take reasonable care of pupils/students under their supervision with the aim of ensuring their safety and welfare.

#### **Pupil/Student development**

- 7.13 Employees must comply with Trust and academy policies and procedures that support the well-being and development of pupils/students.
- 7.14 Employees must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils/students.
- 7.15 Employees must follow reasonable instructions that support the development of pupils/students.

#### **Photography and filming**

- 7.16 All employees must:
  - Only use Trust equipment when taking images of students.
  - Not take any images in secret, all images taken must be in an open forum.
  - Not take academy equipment, such as cameras, out of school without permission from the Principal/Headteacher/SLT.
  - Be clear about the purpose of the activity and about what will happen to the images when the activity is concluded.
  - Be able to justify images of children in their possession.
  - Avoid making images in one-to-one situations or which show a single child with no surrounding context.
  - Ensure the child/young person understands why the images are being taken and has agreed to the activity and that they are appropriately dressed.
  - Report any concerns about any inappropriate or intrusive photographs found.
  - Always ensure they have parental permission to take and/or display photographs.
  - Never display or distribute images of children unless parent/carer consent has been received.
  - Never use images which may cause distress.

## **Inappropriate teaching material / content**

- 7.17 Employees must only show resources which are age appropriate. If showing films that are PG or above, they must be checked beforehand to ensure that the section of the film that is being shown does not include any inappropriate scenes of a violent or sexual nature.
- 7.18 Employees must not allow students to act out / role play / discuss scenarios of a sexual nature or allow students to act out / role play scenes of a violent nature unless as part of a planned lesson and are checked beforehand. Professional judgement must be exercised to ensure the planned lesson, relevant teaching material and methods are age appropriate and checked with the relevant member of the academy leadership team.

## **Physical contact with students and use of “reasonable force”**

- 7.19 In rare circumstances employees may be required to use their professional judgement and exercise physical restraint on a student who is an immediate danger to him/herself or to others.
- 7.20 Employees are expected to be familiar with the relevant academy’s behaviour management policy which must be followed at all times.
- 7.21 Physical restraint must not be used unless absolutely necessary. The types of force which are deemed by the DfE to be reasonable are:
- Passive physical contact resulting from standing between two pupils.
  - Active physical contact such as leading a pupil by the hand or arm; ushering a pupil away by placing a hand in the centre of his/her back; or, in more extreme circumstances, using appropriate restrictive holds.
- 7.22 Employees should not:
- Block doorways or corridors to stop a student leaving unless there is reason to believe the student is about to commit a dangerous act such as harm another student.
  - Act in temper (involve another staff member if you fear loss of control).
  - Involve other pupils in the restraint.
  - Touch or hold the pupil in sexual areas.
  - Twist or force limbs back against a joint.
  - Bend fingers or pull hair.
  - Hold the pupil in a way which will restrict blood flow or breathing e.g. around the neck.
  - Slap, punch, kick or trip up the pupil.
- 7.22 If employees have recourse to use physical restraint they must report this immediately to the Principal /Headteacher or another senior member of staff.

## **8. Relationships at work**

- 8.1 People who work together often form personal friendships and, in some cases, romantic relationships. While personal friendships at work are generally to be encouraged, a romantic relationship between colleagues who work together can sometimes result in actual or potential difficulties. Where there is the possibility that such a relationship could interfere with an individual's objectivity when making decisions or behaviour at work, the matter becomes the rightful concern of the organisation and the steps outlined below must be taken.
- 8.2 Similar problems can arise if two employees who are related to one another work together, either in the same department or in positions requiring that they liaise and cooperate over work matters and the points below also applies to this circumstance.

## **Employees' relationships with members of the Trust board or local governing bodies**

- 8.3 Where relationships occur, the employee must bring it to the attention of the Principal/Headteacher/CEO personally and in confidence so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present.
- 8.4 Employees must not contact members of the local governing body over the Principal/Headteacher about personal employment issues. They should speak to the Principal/Headteacher/ and go through established procedures such as appraisal, grievance and appeal procedures. Employees can also seek advice from their trade union.

#### **Managers' relationships with their staff member**

- 8.5 Where such a relationship occurs, the Principal/ Headteacher/ Line Manager must bring it to the attention of the Principal/ Headteacher or the CEO personally and in confidence so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present. This includes segregation of duties.

#### **Relationships between an employee and their child/grandchild**

- 8.6 Employees are expected to conduct themselves in a professional, sensitive and confidential manner at all times.
- 8.7 Where a relationship exists between an employee and their child/grandchild (whether a colleague or a child enrolled at the school), the employee must bring it to the attention of the Principal/Headteacher/CEO personally and in confidence so that the implications for the Trust and the academy can be discussed and action taken to avoid any difficulties it may present. This includes segregation of duties.

#### **Conflicts of interest arising from any connection employees or their close relations may have with a contractor/partner**

- 8.8 Managers must make sure that ethical standards are embedded in the Trust's relationships with stakeholders, including outside bodies and partners. External suppliers and service providers are required to operate to public sector standards e.g. not offering or providing inappropriate gifts or hospitality to CoLAT employees or members of the Trust Board or local governing bodies. See the Gifts and Hospitality Policy and the Anti-fraud, Bribery and Corruption Policy.
- 8.9 Contracts must be awarded on merit, by fair competition against other tenderers in accordance with the Trust's Procurement and Tendering Policy, and no special favour must be shown to businesses run by, for example, friends, partners and relatives.
- 8.10 Employees, who have responsibility for engaging or supervising contractors, or have any other official relationship with them, must declare any past or current relationships with them (including private, professional and/or domestic relationships) to the Principal/Headteacher/CEO.
- 8.11 Employees must notify their Principal/Headteacher/CEO of any relationship (business or private) they or a close relative may have, or may have had, with an external contractor or potential contractor, so that the implications for the Trust and the academy can be discussed and action taken to avoid any

#### **Employees who are unsure whether or not to disclose information**

- 8.12 Employees must ask their Principal/Headteacher/CEO for advice if there is any doubt as to whether or not information should be disclosed.

### **9. Selection and recruitment (including equal opportunities) and other employment matters**

- 9.1 Employees involved in the recruitment and appointment of employees, must ensure that appointments are made on the basis of merit. In order to avoid any accusation of bias, employees must not be involved

in any selection process involving a prospective employee, to whom they are related or with whom they have a close personal relationship outside work.

- 9.2 All appointments must be made on merit and in accordance with the Trust's Safer Recruitment & Selection Policy and Procedures.

### **Providing references**

- 9.3 References given to other employers on behalf of the Trust or any of the academies must be signed by the Principal/Headteacher, or other nominated senior manager, and ideally on school headed paper. Employees may give personal references but these must never be on academy stationery and must not imply that they are references from CoLAT or any of the individual academies - any personal reference must make it clear that it is provided on a personal basis.

## **10. Outside commitments and personal interests**

### **Conflicts of interest between employees' activities outside and inside work**

- 10.1 Employees must not allow their private interests or beliefs to conflict with their professional duty.
- 10.2 Employees' off-duty hours are their personal concern, but they must not allow private interests to interfere with their professional duties or put themselves in a position where they may appear to conflict.
- 10.3 Employees must:
- Inform the Principal/Headteacher/CEO of any financial and non-financial interest the employee may have, if they think that it might bring about some conflict with their work.
  - Inform the Principal/Headteacher/CEO of any out of work activities which interfere with his or her ability to perform his or her professional duties, is not in the Trust's or academy's best interests, undermines public confidence in the Trust's or academy's affairs or might potentially bring the Trust or academy into disrepute.;
  - Inform the Principal/Headteacher/CEO whether they are employed by a third part to undertake tutoring, babysitting or other roles where they work with children.
  - Report any family tie, or other relationship, with an organisation (or people who work for that organisation) if the employee, in any way, provides advice to senior management on the management or funding of that organisation or is involved in the administration of the contract or other arrangement governing the Trust's or academy's relationship with the organisation.
- 10.4 Employees must not:
- Undertake any private or independent work with any COLAT student outside of work during their employment.

### **Conduct outside of school hours - propriety and behaviour of staff**

- 10.5 All CoLAT staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. Their conduct inside and outside work must never undermine the trust and confidence the public and the Trust need to have in them to carry out their work properly and conscientiously, they should be aware that behaviour in their personal lives may impact upon their work with children and young people.
- 10.6 This means that staff should not:
- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model.
  - Make or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such.

- 10.7 CoLAT has no immediate jurisdiction over the activities that staff undertake outside of school hours and/or off the premises. However, this advice is aimed at minimising the risk of accusations of unprofessional or unsafe conduct. In particular:
- Be aware of the content you post and access on social networking sites such as Facebook. Be aware that content you posted in the past can still be accessed by others and could compromise your integrity.
  - Conduct yourself with dignity and propriety when out socialising in the local area or at arranged staff events.
  - Conduct yourself with dignity and propriety on public transport.
- 10.8 CoLAT staff are seen as role models for young people, whether we are at work or not. We have a duty to maintain high levels of confidence from the community about our ability to keep children safe and our ability to guide young people to make positive life choices.

## **11.0 Financial procedures and use of financial resources**

### **11.1 Appropriate employees must:**

- Ensure that they use any public funds entrusted to them in a responsible and lawful manner
- always try to obtain value for money and avoid legal challenge to the Trust
- be conversant with and comply with the Trust's Scheme of Delegation.

- 11.2 Principals/Headteachers/ /Line managers must make sure that their employees are aware of and comply with the financial policies, procedures and regulations of the Trust and the relevant academy. They must ensure that the financial procedures and practices for which they are responsible conform to these regulations and are secure against theft and fraud.

### **Best value, tendering, outsourcing, partnerships etc.**

- 11.3 Employees who are involved in tendering, outsourcing, partnerships, the awarding of contracts, dealing with contractors, etc. must:

- Be aware of and follow the Trust's Procurement and Tendering Policy.
- Be aware of the Trusts Gifts and Hospitality Policy and the Anti-fraud, Bribery and Corruption Policy.
- Be clear on the separation of client and service-provider roles.
- Not disclose confidential information to any unauthorised party or organisation.
- Exercise fairness and impartiality when dealing with potential service providers.
- Not show special favour to current or former employees or their partners, friends, relatives, or associates in outsourcing to businesses run by them in a senior or relevant managerial capacity.
- Discuss any problems with their Headteacher/Principal/CEO if they are unclear whether or not they may be compromised in relation to the awarding of contracts.

## **12.0 Academy/Trust property**

### **12.1 Employees must:**

- Only use Trust property, vehicles or other facilities for Trust purposes and according to instructions.
- Not remove Trust property, including laptops and phones, from school premises unless authorised to do so.
- Secure Trust property against theft/loss/damage; ensuring that valuable items such as keys, money, credit cards, mobiles, wallets, personal bags, laptops and other valuable items are looked after properly and never left untended even for short periods.
- Return Trust property when requested.
- Report any theft/loss/damage of Trust property.
- Never hand school keys or swipe cards to students.

- 12.2 The loss or theft of any computer or confidential data must be reported immediately to the Principal/ Headteacher/ relevant Line Manager.

- 12.3 The Headteacher/Principal must inform the Chief Financial & Operating Officer of any theft of Trust property and they will advise on whether or not the police should be involved.
- 12.4 The Trust's property includes its "Intellectual property" which includes inventions, creative writings and drawings, including those created by an employee in the course of their duties, in line with contractual terms and conditions.
- 12.5 The Trust does not accept responsibility for loss of or damage to personal property or Trust property in the care of an individual colleague. Cars, bicycles and other means of personal transport are parked or left on Trust premises at the owner's risk.

### **13.0 Gifts, rewards and sanctions**

- 13.1 All employees must read and follow the Trust Gifts and Hospitality Policy.
- 13.2 Although academy staff may receive 'thank you' gifts from pupils at the end of the term, it is serious misconduct for employees to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything in connection with their duties. This also applies to showing favour or disfavour. If it is alleged that an employee has corruptly accepted such a reward it will be for her/him to demonstrate that this is not the case.
- 13.6 All employees must record any gift or hospitality they are offered or receive in accordance with the Trust Gifts and Hospitality Policy. This includes any gift or hospitality that is declined or donated, for example to fundraising events.
- 13.7 Staff should not solicit or accept any gift, loan, fee, hospitality or other reward which influences the way in which they carry out their duties. They should not influence or be influenced unfairly in the way they carry out their duties by ties of kinship or friendship, or by some other association or loyalty.

### **14.0 Sponsorship - giving and receiving**

- 14.1 Where an outside organisation wishes to sponsor a Trust or 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.
- 14.2 Where the Trust or academy wishes to sponsor an event or service no employee nor any partner, spouse or relative must benefit from such sponsorship, directly or indirectly, without there being full disclosure to Principal/Headteacher/CEO of any such interest. Similarly, where the Trust or academy through sponsorship, grant aid, financial or other means, gives support in the community, employees must ensure that impartial advice is given and there is no conflict of interest involved.

### **15.0 Confidentiality and disclosure of information**

- 15.1 Although the Trust and each academy aim to operate in an open and transparent way, some information held by the Trust and each academy is confidential or sensitive and therefore not appropriate to a wide audience and the Trust and each academy may be subject to statutory or common law obligations to keep it confidential. On the other hand, the Trust and each academy is also subject to obligations to release information in some circumstances, for example under the Freedom of Information Act.

#### **Employees' responsibilities for confidential information**

- 15.2 The Headteacher/Principal of each academy must make sure that they have secure systems in their workplace to safeguard confidential information and that employees maintain confidentiality at all times. They must also comply with policies and practices under the Data Protection Act 2018 and the Trust Data Protection Policy.

15.3 Employees must:

- Be aware of the implications of the Data Protection Act 2018 on the use, maintenance, transfer and disclosure of personal information about employees and the public.
- Not disclose any confidential information (including intellectual property) to anyone outside the Trust and make sure that this information is kept securely - this applies while working for the Trust and after they leave.
- Not disclose confidential information to colleagues unless there is proper authority.
- Take all reasonable steps to protect and safeguard confidential documents etc, particularly if they need to be taken outside the usual workplace.

**Personal information about colleagues**

15.4 Employees must keep personal details and work records of other employees confidential and must not reveal these to third parties without authority, or unless the permission of the employees concerned has been obtained, or where it is required by law.

**Giving information to the media**

15.5 Under no circumstances should employees communicate directly with the media (e.g. national and local papers, press agencies, radio, television stations professional journals) about their work, or matters concerning the Trust or any individual academy, unless specifically authorised to do so by the Principal/Headteacher/CEO

15.6 Employees must refer any approach by the media for an interview, an article and/or comment on CoLAT affairs, to the Principal/Headteacher or the central CoLAT senior management team.

15.7 Nothing in these paragraphs prevents senior trade union officials from contacting the media in relation to appropriate trade union activities.

**16.0 Malpractice/ fraud/ corruption/ whistleblowing (Public Interest Disclosure Act)**

16.1 Where an employee becomes aware of activities which that employee believes to be illegal, improper, unethical or otherwise inconsistent with this Code, the employee should report the matter under the Trust's Whistleblowing Policy. This policy sets out the protection available to employees who make disclosures and the protection available under the law.