

CODE OF CONDUCT FOR WOOTTON ACADEMY TRUST EMPLOYEES

Wootton Academy Trust



Employee Code of Conduct

- a) This policy applies to all schools managed by Wootton Academy Trust
- b) This policy was adopted by Wootton Academy Trust in September 2015
- c) This policy will be reviewed by Board of Directors every **two** years thereafter
- d) This policy was reviewed by the Board of Directors in September 2021 and in February 2023**

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1. Introduction

All employees have personal and legal responsibilities, including treating others with dignity and respect; acting honestly, using public funds and Trust equipment appropriately, adhering to health and safety guidelines and practising equal opportunities at all times. These expectations are set out below and should be fully observed by all employees, including the Executive Principal and Wootton Academy Trust's Leadership Teams.

This document is not a prescriptive guide to what employees should and should not do. It is a framework for behaviour highlighting principal areas where employees need to be aware of their responsibilities when working within the Trust.

Employees should ensure they are familiar with the specific policies that underpin these behaviours through reference to the documents highlighted in the "Required Reading" throughout the code. These documents can be found on the **Trust's intranet** and **elsewhere**. **Information on how to access these documents will be given to employees at induction and reminders issued at staff CPD sessions at least annually.**

2. Compliance with the Code of Conduct

The Code of Conduct forms part of an employee's contract. Failure to comply with it and associated WAT Trust Policies ("Required Reading") may result in disciplinary action being taken.

The Trust reserves the right to take legal action against employees where breaches of the Code warrant such action.

3. Professional behaviour and conduct

3.1 Treating other people with dignity and respect

All employees are expected to treat other **employees**, pupils and external contacts, such as parents/**carers**, with dignity and respect.

Employees are required to comply with **WATs Equality Policy**.

The Trust operates zero-tolerance towards behaviour such as discrimination, bullying, harassment or intimidation. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour.

Our culture is professional.

We maintain the highest professional standards including how we address and interact with each other, and with others in our community.

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We address each other formally front of pupils, parents/carers and others; our policy is Mr. or Mrs. or Ms. or Dr. etc. **not given-names.**

In communication with parents/carers and others, we afford the same respect, our policy is Mr. or Mrs. or Ms. or Dr. etc. **not given-names.**

On no account should pupils be allowed or encouraged to refer to employees by their given-name.

3.2 Appropriate relationships with children

Employees are expected to act **openly and transparently to avoid** any reasonable person to suspect their actions or intent.

All employees are in a position of trust and have a duty to protect young people from discrimination and harm and to maintain appropriate professional boundaries.

It is important for **employees** to avoid behaviour that might be misinterpreted by others in order to protect both young people and themselves.

Employees are required to read and understand **WAT** policies including Safeguarding and Child Protection and **to keep up-to-date** on changes to national legislation and policies **by attending WAT CPD sessions and where appropriate, external training courses.**

Employees should also make themselves aware of WATs 'Whistle Blowing' Policy.

3.3 Professional behaviour

Employees must not misuse or misrepresent their position, qualifications or experience or bring the reputation of the Trust into disrepute. Such behaviour may lead to disciplinary action and where relevant, referral to professional bodies.

Employees must ensure their behaviour does not breach the WAT Dignity at Work Policy.

3.4 Criminal actions

Employees must inform the Executive Principal (**or in the case of the EP, the chair of the WAT Board**) immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution. **The EP or WAT Board Chair will determine next steps in these situations, taking appropriate advice from others, where necessary to help safeguard children, the employee and other WAT employees.**

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4. Declaration of interests

Employees are **required to declare any interests** where the group or organisation would be considered to be in conflict with the ethos of the Trust. Membership of a trade union or staff representative group does not need to be declared.

Employees should also consider carefully whether they need to declare to the Trust their relationship with any individual(s) where this might cause a conflict with Trust activities, for example, a relationship with a **Member, Trustee, Local Governor, another employee** or a contractor who provides services to the Trust. Failure to make a relevant declaration of interests is a very serious breach of trust and therefore, if employees are in doubt about a declaration, they are advised to take advice from their Trust or union.

All declarations, including *nil* returns – **where required** - should be submitted in writing to the Executive Principal.

5. Probity of records and other documents

The deliberate falsification of documents is **unacceptable**. Where an employee falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

Where an employee who has claimed any benefit, including housing benefit, either directly or indirectly and has failed to disclose their full earnings, this will be treated as gross misconduct and the employee may be dismissed and referred to the Police.

6. Financial inducements

6.1 Financial Regulations for Trusts

Employees must comply with the Trust's Financial Regulations. Employees should familiarise themselves with these regulations; some of the principal employee requirements are summarised below.

6.2 Business Contacts

In this section, "*business contact*" refers to any person, body or organisation with which the Trust is involved on a financial or charitable basis (including contractors, developers, consultants and regional or national charities). This also includes business contacts who are potential suppliers (e.g. they are tendering for future business).

6.3 Declaration of gifts

Any gift that is received should be declared in writing to the **Chief Finance and Operations Officer [CFOO] in accordance with the Gifts and Hospitality Policy** (Appendix 2) with

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the exception of those items specifically identified in sections 6.4 and 6.5 below.

Declarations shall be available for inspection by the Auditors.

6.4 Gifts or hospitality to an employee

Where a business contact offers a personal gift, personal payment or other incentive such as secondary employment to an employee, **it** should not be accepted and should be returned with a suitable official letter. Such offers should be declared and recorded in the Register of Gifts and Hospitality.

If it is not possible to return gifts, the employee **should declare the gift to the C.F.O.O. who will decide how it is to be used.** Such gifts remain the property of the Trust and should be included in the Register of Gifts and Hospitality.

The only exceptions to these are:

- ❖ low cost, functional items suitable for business use rather than personal use and displaying the supplier's logo e.g. diaries, calendars and pens. These items may be accepted and do not have to be included in the Register of Gifts and Hospitality.
- ❖ **token** gifts offered by parents, carers or pupils to **employees** to express their thanks; however, only gifts with an individual value of £25 or less may be accepted. Such gifts do not have to **be included in the Register** of Gifts and Hospitality. For the avoidance of doubt employees **MUST** always refuse gifts of money.

Where hospitality in the form of meals and drinks is offered by a business contact, this is only acceptable where it forms part of a normal business meeting (for example, refreshments at training events or meals at evening meetings). Offers of hospitality to specific events, such as a dinner or sporting event, should only be accepted after authorisation from the **C.F.O.O.**

These would normally only be approved where there is a clear and demonstrable benefit to the Trust and the hospitality would not expose the Trust to criticism that the business contact was exerting undue influence. These should be recorded in the Register of Gifts and Hospitality. Visits by employees to exhibitions, demonstrations, conferences, business meals and social functions in connection with the Trust's business and authorised by the Trust, shall be at the Trust's expense.

6.5 Gifts or hospitality to the Trust

Where a business contact sends a gift to the Trust (for example, a stationery supplier sending a gift), these should not be accepted and should be returned to the supplier. Such

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offers should be declared to the **C.F.O.O.** and recorded in the Register of Gifts and Hospitality. If it is not possible to return the gift, the employee who usually deals with the supplier should declare the gift to the **C.F.O.O.** who will keep a record of it and decide how it is to be used. Such gifts remain the property of the Trust and should be included in the Register of Gifts and Hospitality.

The only exceptions to this are low cost, functional items suitable for business use (as opposed to personal use), such as diaries, calendars or pens, which may be accepted and do not have to be declared on the Register of Business Interests.

7 Use of Trust contacts

Apart from participating in concessionary schemes arranged by trade unions or other such groups for their members, employees shall not use Trust business contacts for acquiring materials or services at trade / discount prices for non-Trust activities.

7.1 Required reading:

- **WAT Financial Regulations**– available on the intranet.

8. Other employment

Employees are permitted to take up secondary employment outside the Trust, as long as the activity does not constitute a conflict of interest, adversely affect their primary employment at the Trust or exceed the legal maximum working week of 48 hours as defined by the Working Time Regulations.

The secondary employment must be undertaken outside the working hours of the employee's normal post and employees are required to keep the Executive Principal (**WAT Chair if the employee is the EP**) informed of their employment at other organisations.

Any employment which requires work to be undertaken within school hours, for example as an examiner, must be referred to the Executive Principal in the first instance.

9. Health and safety

Employees must adhere to the Trust's Health and Safety Policy, procedures and guidance and must ensure that they take every action to keep themselves and everyone in **WAT academy environments** safe and well. This includes taking immediate safety action in a potentially harmful situation (either at a **WAT academy** or off-site) by complying with statutory and Trust guidelines and collaborating with employees, **the local authority and other agencies (e.g. H.S.E.)**.

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9.1 Required reading:

- ❖ Wootton Academy Trust's Health and Safety Policy;
- ❖ **HSE Employee Leaflet**

10. Use of alcohol and illegal drugs

The taking of illegal drugs during working hours is unacceptable and will not be tolerated. All employees are expected to attend work without being under the influence of alcohol or illegal drugs and without their performance being adversely impacted by the consumption of alcohol or illegal drugs. If alcohol or drug usage impacts on an employee's working life, the Trust has the right to discuss the matter with the employee and take appropriate action, having considered factors such as the Trust's or local authority's reputation and public confidence. This also applies to the use of prescribed medication where senior leaders believe that it is having an adverse impact on an employee's performance.

11. Use of Trust premises, equipment & communication systems

WAT equipment and systems (phone, email and computers) are available only for Trust-related activities and should not be used for the fulfilment of another job or for personal use. This is unless authorised by the Executive Principal (**WAT Chair if the employee is the EP**) in case of an emergency, or where used for brief periods outside of working hours. This includes technical equipment, photocopy facilities, stationery and premises. It also applies to access provided for remote use (e.g. hand held portable devices etc.) and to staff working outside of Trust premises and using their own IT equipment.

Illegal, inappropriate or unacceptable use of Trust equipment or communication systems may result in disciplinary action and in serious cases could lead to an employee's dismissal.

This list is not exhaustive and includes:

- ❖ creating, sending or forwarding any message- **image or other – by text, email, or social media**, that would reasonably be considered inappropriate or unacceptable;
- ❖ committing or implying commitment to any contractual arrangements;
- ❖ accessing, publication or circulation of illegal, offensive, unacceptable, inappropriate or non-work related material;
- ❖ any illegal activities;
- ❖ posting confidential information about the Trust and/or other employees, children or parents;

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- ❖ gambling or gaming;
- ❖ unauthorised use of Trust facilities (or employee's personal IT equipment), for personal use during employee's working time.

Employees receiving inappropriate communication or material or who are unsure about whether something h/she proposes to do might breach this policy should seek advice from the Executive Principal or **the C.F.O.O.**

Wootton Academy Trust has the right to monitor e-mails, phone-calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems. Communication systems may be accessed if the Trust suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity. Accredited Trade Union representatives **may** use **academy** communication systems for the purposes of undertaking trade union duties and these will be treated as confidential.

Passwords should not be shared and access to computer systems must be kept confidential. Breach of this confidentiality may be subject to disciplinary action. Where appropriate the Trust should consider a system of proxy access.

Any **WAT** equipment that is used outside Trust premises, for example laptops, should be returned to the Trust when the employee leaves employment or upon request by the Executive Principal.

12. Social networking websites

Trust employees must not access social networking websites for personal use (i.e. non- job related use) during work time. Access to some journals, blogs and social networking sites is permitted during work time for the purposes of undertaking job related duties only.

Trust employees must act in the best interests of the Trust and not disclose personal data or information about any individual including employees, pupils, other young people or children. This includes images. Access may be withdrawn and disciplinary action taken if there is a breach of confidentiality or defamatory remarks are made about the Trust, **employees, pupils or** young people or children.

The Trust respects that **all employees are entitled to** a private life. However, it must also ensure that confidentiality and its reputation are protected and **not brought into disrepute** by actions in an employee's private life.

Employees using social networking websites in their private life:

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- ❖ must refrain from identifying themselves as working for the Trust, in a way which has, or may have, the effect of bringing the Trust into disrepute;
- ❖ must not identify other Wootton Academy Trust employees, **pupils, other** children or young people without the written consent of their parents;
- ❖ must not make any defamatory remarks about Wootton Academy Trust, its employees, **pupils, other** children or young people, or conduct themselves in a way that is detrimental to the Trust;
- ❖ disclose personal data or information about the Trust, employees, **pupils, other** children or young people, that could breach the **GDPR 2018**, for example, posting photographs or images of children or young people;
- ❖ must not allow pupils to access their personal social networking accounts - and **if** they are contacted by a pupil they should bring it to the Executive Principal's attention.

13. Personal Websites and Blogs

Employees who wish to set up personal web-forums, weblogs or 'blogs' must do so outside of work, not **using** Trust equipment and adhere to the points **detailed above**.

14. Confidentiality

All **WAT employees access** a significant volume of data and information in relation to pupils, **employees**, Trust activities and many other matters. There is an obligation to read and to observe the **GDPR 2018** requirements **and to complete refresher training as required by WAT**.

14.1 Required reading:

- ❖ Wootton Academy Trust -Data Protection Policy and Procedures
- ❖ **Wootton Academy Trust – Acceptable User Agreement**

14.2 Managing data

- ❖ Employees are required to collect, maintain and dispose of sensitive or personal data in a responsible manner, **either shredding it or putting it in locked confidential waste bins provided for this purpose**.

14.3 Disclosing data

- ❖ Employees should not disclose sensitive information about the Trust, its employees or the local authority to other parties, for example, parents or colleagues. There are particular exceptions to this; for example, disclosure of suspected or alleged abuse of a pupil to Child Protection officers; discussion with a person accompanying or

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representing an employee in a formal meeting or disclosure under the Whistleblowing Procedure.

- ❖ All communication with the media must be directed through the Executive Principal or their nominee.
- ❖ There are circumstances in which staff are obliged to release pupil data, for example, parents seeking information about pupil progress;
- ❖ **Employees** should be aware that, from time to time, information about employees' salaries is matched with other public sector information (for example housing benefits) in order to prevent fraudulent claims.

14.4 Access to data

Individuals have the right to request access to data that is held about them; **employees access requests** should be made to the Executive Principal who will address the request.

15. Copyright

Copyright legislation should be displayed next to photocopier machines and employees are required to adhere to the guidance provided about use of educational resources.

15.1 Required reading:

- ❖ Copyright notices in Trust

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APPENDIX ONE

REGISTER OF BUSINESS INTERESTS FORM

Member, Trustee, Local Governor and Employee declaration form

I wish to declare the following information in accordance with the requirements that WAT maintains a Register of Business Interests.

Name:

Role/Post:

Signature:

Date:

You should provide full details of your declaration below, including a nil return:

Declaration of relationships or contracting arrangements	
Relationships or links with businesses. Contracts or proposed contracts (or any activity which would cause potential conflict) in which you are involved / interested.	State whether the interest is direct or indirect, and the nature of the interest.

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APPENDIX TWO

REGISTER OF GIFTS AND HOSPITALITY

Member, Director, Local Governor and Employee declaration form

I wish to declare the following information in accordance with WATs requirements that a Register of Gifts and Hospitality should be maintained.

Name:

Role/Post:

Signature:

Date:

You should provide full details of your declaration below, including a nil return:

Declaration of gifts and hospitality		
Date gift received	From whom	Gift or hospitality

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APPENDIX THREE

REQUIRED READING

- ❖ DfE **Teacher Standards** (*Teachers only*)
- ❖ Bedford Borough **Safer Working Practices for Adults Working with Children in an Education**
- ❖ Wootton Academy Trust **Safeguarding and Child Protection Policy.**
- ❖ DfE **Keeping Children Safe in Education 2022** [Part One]
- ❖ **Guidance for Safer Working Practice for those working with children and young people in education settings February 2022**
- ❖ **Working Together to Safeguard Children 2018 [July 2022 update]**
- ❖ Wootton Academy Trust **Health and Safety Policy**
- ❖ Wootton Academy Trust **Whistle Blowing Policy**
- ❖ Wootton Academy Trust **Dignity at Work Policy**
- ❖ Wootton Academy Trust **Equalities Policy**
- ❖ Wootton Academy Trust **Employee Handbook, other WAT Policies and Procedures [e.g. GDPR, Acceptable Network User Agreements, Finance]**
- ❖ Wootton Academy Trust **WAT Code of Conduct**
- ❖ Wootton Academy Trust **Financial Regulations [all budget holders]**
- ❖ Wootton Academy Trust **Gifts and Hospitality Policy**

I declare that I have read and understood the Code of Conduct for all employees of Wootton Academy Trust and the associated "Required Reading" (see above).

Name_____ Date_____

Signature_____

[Please note an electronic declaration to confirm you have read these documents was introduced in 2020]

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