



**Brontë Academy Trust**  
Great schools. Inspirational people. Strong foundations.

## **Bronte Academy Trust Staff Code of Conduct Policy**

| <b>Reviewed By</b> | <b>Approved By</b> | <b>Date of Approval</b> | <b>Version Approved</b> | <b>Next Review Date</b> |
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This policy is reviewed on a bi-annual basis by the Trustees; any changes made to this policy will be communicated to the relevant members of staff.

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## **1 ABOUT THIS DOCUMENT**

Bronte Academy Trust expects the highest standards of personal and professional conduct from all employees. As such the Trust requires all Employees to act in a manner which reflects the values and ethos of the Trust.

Employees must ensure that their behaviours and actions are consistent with their position as a role model to pupils and are compatible with working with young people in a school setting.

Employees must act with integrity, honesty and demonstrate ethical and respectful working practices towards pupils, colleagues, parents / carers and other members of the school community.

All employees have a responsibility to observe appropriate professional boundaries and act at all times in a manner which safeguards and promotes the welfare of pupils.

Employees must disclose any relevant information which may impact on their job role or suitability to work with young people or within a school setting.

The Trust requires all employees to adhere to all Trust and school policies and observe the highest standards of business / finance practice.

Each employee has an individual responsibility to act in a manner which upholds the Trust's interests and protects its reputation.

Employees are accountable for their actions and conduct and should seek advice from their line manager if they are not sure of the appropriate action to take.

Employees should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action, including dismissal.

This document explains the Trust's expectations with regards to the conduct of employees in the following areas:

- a) Professional conduct
- b) Safeguarding pupils
- c) Use of ICT and Social Media
- d) Business conduct

## **2 SCOPE**

This document applies to all current employees, volunteers and all levels of governance of Bronte Academy Trust. Supply and agency workers engaged by the Trust are also required to adhere to this document.

Reference to the management role of the CEO in this document may include his / her identified nominee.

## **3 RESPONSIBILITIES OF THE TRUST**

- Explain The provisions of the Code of Conduct to employees and signpost employees to other relevant policies, documents and guidelines

- Provide additional advice and guidance to employees in relation to queries they may have regarding the application of the code of conduct
- Coach, support and provide feedback to employees on their performance in relation to the required standards of conduct
- Empower staff to share any safeguarding concerns ensuring that clear procedures are in place for staff to do this
- Take appropriate action at the earliest opportunity to address breaches of the expected standards of conduct
- Ensure that any concerns about supply and agency staff are promptly notified to their employers

#### **4 RESPONSIBILITIES OF THE EMPLOYEE**

- To read, understand and comply with the Code of Conduct at all times
- To ensure this code is used, alongside other relevant Trust policies and professional standards / codes to guide them in their role
- The safeguarding culture of the Trust will, in part, be exercised through the development of respectful, caring and professional relationships between adults and children and behaviour by the adult that demonstrates integrity, maturity and good judgement
- To seek guidance from their line manager if they are unclear about the conduct or actions expected of them
- To alert the headteacher at the earliest opportunity if they are aware that they have conducted themselves in a way which may have breached the expected standards of conduct
- To alert the headteacher at the earliest opportunity if they become aware or witnessed that a work colleague has conducted themselves in a way which may have breached the expected standards of conduct

#### **Reference to other sources of information**

This Code of Conduct is not exhaustive and does not replace the general requirements of the law, common sense and good conduct.

In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the provisions of the STPCD, the latest 'Teachers' Standards 2021' and in relation to this policy, Part 2 of Teachers Standards – Personal and Professional Conduct. Whilst this is a contractual requirement of teaching posts only, the Trust expects all employees to reflect these expectations in their conduct.

All employees must also ensure they have read, understood and comply with Part 1 of the current Keeping Children Safe in Education.

Staff must also have due regard to other professional codes, policies and guidance which may be relevant to their specific role.

#### **5 PROFESSIONAL CONDUCT**

##### **General**

Employees are expected to demonstrate consistently high standards of personal and professional conduct.

Employees are required to work in a diligent and conscientious manner.

Employees are expected to work to the requirements of their job and are required to respect managerial authority and follow reasonable instructions.

Employees must conduct themselves in a manner which reflects the ethos of the Trust and adhere to Trust policies and procedures at all times.

Employees should ensure they work their contracted hours and are expected to maintain a high level of attendance and punctuality.

## **6 HONESTY AND INTEGRITY**

Employees must maintain high standards of honesty and integrity in their work.

Employees should not behave in a manner which would call into question their motivation or intentions.

During the course of their work employees should ensure they do not:

- Provide false / misleading information
- Destroy or alter information / records without proper authorisation
- Withhold information or conceal matters which they could reasonably be expected to have disclosed
- Misrepresent the Trust or their position
- Accept or offer any form of bribe/inducement or engage in any other corrupt working practice

Should an employee become aware of any conduct on the part of a colleague which raises concerns regarding health and safety, safeguarding or criminal activity – they have a duty to disclose this.

Allegations concerning, fraudulent, dishonest or corrupt practices or the falsification or withholding of information may be addressed as a disciplinary matter.

### **Setting an Example**

Employees are role models and must adhere to behaviour that sets a good example to all pupils and is appropriate in a school setting.

This includes:

- Refraining from abusive or potentially offensive / discriminatory language or actions
- Demonstrating tolerance and respects towards others
- Observing boundaries appropriate to a school setting
- Ensuring any topics of conversation with pupils are suitable to the school setting / curriculum
- Refraining from allowing personal / political opinions to impact on the discharge of duties and/or unduly influence pupils
- Maintaining high standards of personal presentation, attendance and punctuality

Should employees be in doubt about the appropriateness of their behaviour they should seek guidance from the headteacher. Breaches of expected behaviour may be considered under the disciplinary procedures.

## **Leadership Behaviours**

Leaders at Bronte Academy Trust recognise they greatly influence the climate of the Trust, are role models to all staff and must demonstrate exemplary behaviour.

This includes:

- Being consistent and predictable, remaining calm and able to keep emotions in check no matter the situation
- Demonstrating respect and positive high regard for all staff, parents and pupils
- Communicating positively and responding quickly to difficult issues and concerns

## **7 CONFIDENTIALITY**

Employees may have access to confidential or sensitive information about pupils, colleagues or the business and operation of the Trust as part of their job role.

Such information must not be disclosed to any person who is not entitled to have access to this or legitimately needs it for work purposes.

Specifically, all employees must:

- Work in accordance with the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000
- Observe the Trust's procedures for the release of information to other agencies and members of the public
- Not use or share confidential information inappropriately or for personal gain
- Not speak inappropriately about the school community, pupils, parents, staff, any layer of governance and members of the public
- Ensure all confidential data is kept secure and password protected

Should employees be in doubt about the appropriateness of sharing information they should seek guidance from the headteacher.

## **8 WORKING RELATIONSHIPS & RELATIONSHIPS WITH OTHER STAKEHOLDERS**

The Trust expects employees to maintain positive and professional working relationships. Colleagues, pupils, parents and other stakeholders should be treated with dignity and respect.

Employees should be polite and courteous in their interactions with parents/pupils and other stakeholders/members of the school community.

Behaviour which constitutes bullying and harassment, intimidation, victimisation or discrimination will not be tolerated and may be addressed via the Trust disciplinary policy. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour with colleagues, pupils and parents.

Where an individual is employed in a Trust in which their child is a pupil they should ensure that appropriate professional boundaries are maintained. Should employees be in doubt about the appropriateness of professional boundaries, they should seek guidance from the headteacher.

Employees should treat all stakeholders in a fair and equitable way and not behave in a manner which may demean, distress, offend or discriminate against others.

Employees should ensure that policies relating to equality issues are complied with.

Employees should be aware of the Trust's Complaints Procedures and address any concerns from parents / pupils and other stakeholders in accordance with this document.

## **9 CONDUCT OUTSIDE OF THE WORKPLACE**

Employees must not engage in conduct outside of work which has potential to:

- Affect or is likely to affect the suitability of the employee to undertake their job role or work with children/young people or in a school setting
- Impact on the operation or reputation or standing of the Trust
- Impact on the operation or reputation of the Trust's relationship with its staff, parents, pupils and stakeholders
- Seriously undermine the trust and confidence that the Trust has in the employee to undertake their job role or work with children in a school setting

The above actions may be the subject of disciplinary action which could lead to dismissal.

## **10 DUTY TO DISCLOSE**

Employees have a duty to immediately disclose to the headteacher prior to the start of their employment, at the start of their employment or during the course of their employment, any change in their circumstance or any information which may affect or is likely to affect the suitability of the employee to undertake their job role or work with children in a school setting.

This includes, but is not restricted to:

- The employee being subject to any police investigation/enquiry, arrest, ban, charge, caution, reprimand, warning, fine or pending prosecution or criminal conviction. This includes any actions committed overseas which would be subject to a police investigation or formal action if such actions had been committed in any part of the United Kingdom
- The employee being subject to the inclusion on the DBS Children's Barred List and any change in DBS status during employment, or any referral, made to, or any, investigation or proceedings being undertaken by the DBS
- The employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by any other regulatory or profession authorities or actions of other agencies relating to child protection and or safeguarding concerns
- The employee being subject to any orders made in relation to the care of children, the refusal or cancellation of registration relating to childcare, or children's homes, or being prohibited from private fostering
- The employee being subject to any 'live' disciplinary process, formal sanction or any other relevant information arising from a previous or current secondary employment / voluntary work which may impact on the employee's suitability to undertake their role or with children or in a school setting. This includes substantiated safeguarding allegations

This list is not exhaustive. Should an employee be unclear about whether it is appropriate to disclose a matter they are encouraged to seek guidance from the headteacher at the earliest opportunity.

Employees must also report any current or historical information in the public domain or which is likely to come into the public domain which may be of relevance to their job role or their suitability to work with children or in a school setting or matters which may be subject to adverse media attention or have a detrimental impact on the reputation of the Trust.

In the case of individuals who work with, or manage the education of, early years pupils (reception age or younger) during school hours, and children up to the age of eight in relation to activities outside of the school day (for example breakfast or after school club employees), the following legislative provisions also apply.

In accordance with the Childcare (Disqualification) Regulations 2018 (Section 75 of the Childcare Act 2006) an employee should immediately disclose to the headteacher if they:

- Are disqualified from providing childcare provision or being involved in the management of such provision, including where any application for an Ofsted waiver from disqualification has been made, regardless of whether such an application was successful

In all cases disclosures will be handled sensitively and discretely, and in accordance with the relevant data protection principles and the data protection act. Such disclosures may result in a suspension from duties while an investigation or risk assessment takes place. The headteacher will discuss this with the employee in the context of their role and responsibilities in order to help safeguard children and other employees at the Trust.

Any failure to disclose any information required in the course of employment or any other information that may have a bearing on an individual's suitability to carry out their job role or work with children or in a school setting may be the subject of disciplinary action which could lead to dismissal.

## **11 SECONDARY EMPLOYMENT**

Employees should ensure that their activities outside of work do not conflict with their duty to the Trust.

Employees must discuss with their headteacher before taking up additional paid employment and must ensure the following:

- It does not affect or is unlikely to affect the suitability of the employee to undertake their role within the Trust
- It does not conflict with the interests of the Trust or have the potential to bring the Trust into disrepute
- There is no detrimental impact on an employee's work performance or their own or others health and safety
- Privileged or confidential information is not shared
- Work is undertaken outside of the school and of contracted hours of work
- The activity is not in direct competition with those of the Trust

It is an employee's responsibility to monitor the hours they work and ensure they are rested and refreshed to be able to carry out their role.



## **14 INTELLECTUAL PROPERTY**

All employees should note that any documents or programmes etc, created within the scope of their employment are the intellectual property of the Trust and should not be sold or shared with other individuals or organisations outside of the Trust unless specific permission is granted to the employee to have ownership of such materials.

## **13 DRESS AND PRESENTATION**

All employees must ensure their dress, personal appearance and personal hygiene is appropriate to the professional nature of their role in the Trust and promotes a professional image.

Dress should be appropriate to the activities an employee is engaged in and any related health and safety requirements.

Employees should wear their identity badge at all times.

Employees should not wear clothes with political or other contentious slogans.

The Trust recognises the diversity of cultures and religions of its employees and will take a sensitive approach where this affects dress and uniform requirements.

Staff are expected to adhere to the same standard of appearance when delivering online or virtual teaching.

## **14 SMOKING AND THE USE OF DRUGS AND ALCOHOL**

The Trust is a no-smoking establishment. Smoking and the use of e-cigarettes or 'vaping' is not allowed on Trust premises. Staff should refrain from smoking immediately outside of the school entrances.

Employees must not consume/use alcohol, illicit drugs or other illegal substances in the workplace or be under the influence of such substances whilst at work.

Employees must ensure that any use of alcohol/other substances outside of work does not adversely affect their work performance, attendance, working relationships, health and safety of themselves and others or damage the Trust's image and reputation.

## **15 HEALTH AND SAFETY AT WORK**

All employees must, by law, take reasonable care for their own health and safety and that of others in the workplace.

Employees are required to comply with the Trust's Health and Safety Policy and agreed procedures at all times.

This includes:

- Avoiding risk or injury or danger to yourself or others
- Complying with hygiene requirements

- Reporting, at the earliest opportunity, any hazards, defects, accidents or incidents to the headteacher or other designated person
- Not interfering with, or misusing, anything provided for health, safety or welfare
- Informing the school of any medical condition or medication which has been prescribed which may have an impact on health and safety in the workplace

## **16 CONTACT WITH THE MEDIA**

All enquiries from the media should be directed to the CEO.

Employees should not make contact with or comment to the media about matters relating to the Trust without prior approval from the CEO.

Employees should speak to the headteacher in the first instance about any concerns they have regarding their own employment or operation of the Trust and/or may refer to the Trust's Whistleblowing Policy or Grievance Policy if they wish to raise a formal complaint.

Should an employee speak directly to the media about non-Trust matters, care should be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of or representing the Trust.

Any contact with the media in a personal capacity should be compatible with the employees' role and their position working with children in a school setting and must not negatively impact on the reputation of the Trust.

## **17 WHISTLEBLOWING**

Employees may raise concerns about any aspect of the operation of the Trust which is not directly related to their own employment through the Whistleblowing Policy.

Employees raising a concern with reasonable grounds for doing so will not be subject to discrimination, harassment or victimisation.

*Please also refer to the Trust Whistleblowing Policy.*

## **18 MISCONDUCT**

Failure to follow the Code of Conduct may result in disciplinary action, including dismissal. Employees should ensure they are familiar with the type of conduct which may be regarded as a breach of Trust rules.

## **19 SAFEGUARDING PUPILS**

### **General Obligations**

All employees have a responsibility to:

- Safeguard pupils from physical abuse, sexual abuse, emotional abuse and neglect
- Promote the welfare of pupils and provide a safe environment in which children can learn

- Identify children who may need extra help or who are suffering, or are likely to suffer, significant harm
- Report as soon as possible and without delay any concerns regarding child protection / safeguarding to the headteacher / DSL or CEO where concerns relate to the headteacher

All employees must ensure they have read, understood and comply with:

- Part 1 of Keeping Children Safe in Education
- Trust Safeguarding Policy
- Additionally, employees with managerial responsibilities must ensure they comply with the Trust's procedure for Managing Allegations against Staff and Parts 2-4 of Keeping Children Safe in Education

Employees must attend and comply with any training as required by the Trust associated with the safeguarding of pupils.

## **20 APPROPRIATE RELATIONSHIPS WITH PUPILS**

Employees must maintain appropriate professional boundaries with pupils.

Employees are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. In order to protect both children and themselves, employees should also avoid behaviour that might be misinterpreted by others.

Any sexual behaviour by a member of staff with or towards a child is unacceptable. It is an offence for a member of staff in a position of trust to engage in sexual activity with a child under 18 years of age.

Sexual activity with a child is a matter for criminal and disciplinary procedures. Engaging in sexual activity with a young person over 18 years of age who is still a student at the school will also be regarded as unacceptable and a member of staff who does so will be subject to disciplinary procedures.

Staff must avoid any form of touch or comment which is, or may be considered indecent and should avoid any form of communication with a child which could be interpreted as sexually suggestive, provocative or give rise to speculation. Sexual matters should not be discussed with or in the presence of children other than within agreed curriculum content or as part of their recognised job role.

## **21 SOCIAL CONTACT OUTSIDE THE WORKPLACE**

It is recognised that staff may have genuine pre-existing friendships and social contact with parents of children, independent of the professional relationship.

Staff should recognise that some types of social contact with children or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring the Trust into disrepute.

If a child or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should consult with their line manager at the first opportunity.

As part of their professional role some staff may be required to support a parent/carer. Should the parent/carer seek to extend this support outside of the agreed professional role, this should be immediately discussed with the headteacher and if necessary, referrals made to the appropriate support agency.

## **22 TRANSPORTING CHILDREN**

In certain situations, staff or volunteers may be required to offer to transport children as part of their work. As with any other activity the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks. Staff should not offer lifts to children, unless this has been agreed by the headteacher where no other alternative is available.

Staff should never offer to transport children outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these situations, the matter should be recorded and reported to both the headteacher and the child's parent/carer.

## **23 PHYSICAL CONTACT**

The experience of physical contact is a subjective issue and will be experienced by each child differently according to experiences. This is an area that can lead to misinterpretation and allegations of inappropriate behaviour. It is therefore essential that staff consider why they need to touch a child and whether it is necessary.

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the child's individual needs, age, stage of development and any agreed care plan.

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child, in one set of circumstances, may not be appropriate in another, or with a different child.

## **24 HOME VISITS**

All work with children and parents should usually be undertaken in the school or other recognised workplace. There are, however, occasions, in response to an urgent, unplanned or specific situation or job role, where it is necessary to make either one-off or regular home visits.

A risk assessment must be completed prior to the visit taking place to safeguard both staff and children. Consideration should be given to any circumstance which may put the member of staff in a vulnerable position.

## **25 ONE-TO-ONE SITUATIONS**

Whenever working in a one-to-one situation, a risk assessment relating to the specific nature and implications of the one-to-one should be undertaken. Staff should ensure that wherever possible there is visual access and/or an open door. Use of 'engaged' or equivalent signs should be avoided as this could lead to an interpretation of secrecy. If a child becomes distressed or angry during a one-to-one session this should always be reported.

## **26 ALLEGATIONS AGAINST MEMBERS OF STAFF AND VOLUNTEERS**

All employees have a duty to report to the headteacher / DSL at the earliest opportunity the conduct of a colleague which may place a child at risk.

Where the concerns relate to the headteacher these should be reported to the CEO.

Failure to report such concerns may be regarded as a disciplinary matter.

## **27 ICT AND SOCIAL MEDIA**

### **General Obligations**

Employees should ensure that they have read, understand and comply with the Trust's Staff ICT and Electronic Device Policy at all times.

Whilst at work or using a work device all employees must:

- Ensure all electronic communication with pupils, parent/carers, colleagues and other stakeholders is compatible with their professional role, appropriate boundaries and in line with Trust policies
- Not to use work IT equipment to browse, create, transmit, display, publish or forward any material images which is illegal, sexually explicit, obscene or could offend, harass or upset others or anything which could bring an employee's professional role or the Trust into disrepute
- Not to use personal IT equipment to browse, create, transmit, display, publish or forward any materials / images which are illegal or could offend or harass others or anything which could bring an employee's professional role or the Trust into disrepute
- Ensure that ICT system security is respected and password protocols are observed – including the use of strong passwords and encryption
- Not install personal software on Trust equipment or make unauthorised copies of Trust registered software

## **28 USE OF SOCIAL MEDIA**

Employees must ensure that their online presence / profile is compatible with their professional role.

All employees should:

- Ensure appropriate privacy setting are applied when using social media sites
- Refrain from sharing confidential / privileged information, discussing incidents, operational or employment matters or making critical/negative comments about the Trust/pupils/stakeholders/parents or colleagues on such forums
- Not browse, create, transmit, display, publish or forward any material/images which is illegal, could offend or harass or anything which could bring an employee's professional role or the Trust into disrepute
- Never share post images of pupils without Trust and parental permission
- Not post images of work colleagues without permission
- Not access or update personal social media sites using Trust devices / during work time

Employees should not make contact with pupils or parents via social media accounts or have these individuals as social media 'friends' / 'contacts'

Employees should seek guidance from their headteacher if they are unclear about the conduct or actions expected of them.

## **29 USE OF PERSONAL MOBILE / DEVICES**

Employees are expected to use Trust-owned equipment, including cameras and tablets wherever these are available.

Where no suitable Trust equipment is available and there is a genuine operational need, employees may use their personal mobile phone or tablet to take photographs or recordings for authorised Trust purposes only, for example to record learning, educational activities or achievement.

Where a personal device is used:

- Images must only be taken for legitimate Trust business and in accordance with parental permissions
- Images must be uploaded to the Trust's approved storage or communication platform as soon as reasonably practicable
- All images must then be permanently deleted from the personal device, including the 'recently deleted' or equivalent folder
- Employees must ensure that their device is password protected

Employees should ensure that mobile devices are silent at all times whilst in the classroom or where children are present. Mobile devices should not be left on display.

## **30 MONITORING OF USAGE**

Emails, documents or browsing history on Trust systems should not be considered to be private and may be monitored and recorded to ensure the safety of pupils and ensure compliance with this policy. This monitoring will be proportionate and will take place in accordance with data protection / privacy legislation.

The Trust may address concerns regarding unauthorised, unacceptable or inappropriate use of ICT systems / devices or social media as a disciplinary matter.

## **31 PHOTOGRAPHY, VIDEOS AND OTHER IMAGES**

Wherever possible, Trust owned equipment should be used to take photographs or videos of pupils for educational or Trust purposes. Where no suitable Trust equipment is available, staff may use their personal mobile phone or tablet only where there is a genuine operational need and in accordance with Section 29 of this policy. Any images taken must be uploaded to the Trust's approved system and permanently deleted from the personal device immediately afterwards. Images must never be stored on personal devices, uploaded to personal cloud storage, shared via personal messaging services or used for personal purposes.

Adults must not:

- Take images for children for personal use
- Take images of children in a state of undress or semi-dress
- Take images of children which could be considered as indecent or sexual

## **32 BUSINESS CONDUCT**

### **Use of Financial Resources**

The Trust requires employees to observe the highest standards of business practice.

Employees should ensure that Trust funds with which they are entrusted are used in a responsible and lawful manner.

Employees must comply with the Trust's stipulated financial regulations and any other relevant policies / audit requirements.

Appropriate authorisation should be sought for any expenditure and audit trail/suitable records kept.

Trust monies, credit cards and accounts should not be used for personal purposes.

The use of personal credit cards / accounts to purchase goods and services on behalf of the Trust should be avoided unless prior agreement from the CFO is obtained.

All expense claims for travel and subsistence should be appropriately authorised and accompanied by receipts / proof of purchase.

Personal loyalty cards should not be used when making purchases on behalf of the Trust.

## **33 PERSONAL USE OF EQUIPMENT AND RESOURCES**

Employees may not make personal use of the Trust's property, materials or facilities unless authorised to do so by the CEO.

## **34 DECLARATION OF INTERESTS**

The Trust recognises that employees may wish to take an active role in the local community and undertake additional personal / business activities outside of work.

In the majority of instances such activities will have no impact on their role in the Trust. However, on occasion there may be a potential conflict of interest.

Employees should therefore declare annually to the CFO any financial or non-financial interests which may conflict with those of the Trust. Employees should also declare membership of any professional bodies or organisations which may conflict with their role in the Trust.

Should employees be in doubt whether a conflict of interest may exist they should seek guidance from the headteacher.

## **35 ENTERING CONTRACTS FOR SERVICE**

Employees should follow agreed Trust protocols for the award of contracts to external providers.

Employees should adhere to Trust rules regarding the separation of roles in procurement / tendering process.

In particular care should be taken to ensure competition between prospective contractors is fair and open and that all competing parties are treated equally.

Employees should ensure that preferential treatment is not shown to current / former employees or partners, close relatives or friends / associates in the award of contracts.

Employees must not accept any form of financial or other inducement which may be offered by a potential contractor. All such approaches should be reported to the CEO.

Confidential information relating to the tendering process, must not be disclosed to any unauthorised party or organisation.

### **36 GIFTS AND HOSPITALITY**

Employees should not accept significant gifts from parents / pupils, actual or potential contractors or outside suppliers which could compromise the individual or the Trust.

Employees should notify the CFO should they receive any unsolicited gifts and return the item with a polite refusal letter to the sender. A record should be kept of all gifts received.

Small tokens of appreciation which have no substantial financial value (less than £25) such as presents from pupils at the end of term may be accepted and do not have to be declared.

Employees may only accept an offer of hospitality if there is a genuine need to do so in order to represent the Trust in the community. Employees should discuss any invitations with the CEO.

Where the Trust receives sponsorship of a Trust activity / event, care should be taken to ensure that this does not infer that the sponsor will receive preferential treatment in any future contracting / tendering process. An employee or their partner, family member or friend may not benefit from the sponsorship.

Any reward given to a child should be in accordance with agreed practice, consistent with the Trust's Behaviour Policy, recorded and not based on favouritism. **See Trust Gifts, Hospitality & Anti Bribery Policy**

### **37 APPOINTMENT OF STAFF**

An employee should not be involved in a recruitment process or promotion decision where one of the applicants is a relative, partner or close friend. If this is unavoidable, employees should speak to the headteacher who may need to get advice from HR.

### **38 POLITICAL ACTIVITY**

Employees may engage in political activity outside of work – however they should not allow personal / political views to interfere with their duties. Any activity should be compatible with the employee's responsibility as a role model to pupils.



Where an employee is involved in political activity outside of work – care must be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of or representing the Trust.

40 MONITORING AND REVIEW

This policy will be reviewed on a bi-annual basis by the Trustees and any changes made will be communicated to all members of staff.

Declaration of Responsibility

This Code of Conduct Policy was reviewed and formally adopted by Bronte Academy Trust on

.....28 Jan 25.....Date



.....Signed Chair of Trustees



.....Signed Chief Executive Officer