

TRINITY ACADEMY NEWCASTLE TRUST

Code of Conduct

**Approved by the Committee – October 2017
On behalf of the Board**

Next Review – October 2018

Code of Conduct for Staff

1 Purpose

This code outlines the rules that apply to staff employed in the Trust and provides guidance to help keep to them. The code sets out the minimum standards that are expected of employees and provides a framework that will help to prevent misunderstandings or criticism.

2 Roles and Responsibilities

- **Board of Directors:** The Board of Directors has a general role in ensuring that appropriate standards of conduct are established and maintained. Members of the Board of Directors may also be involved in dealing with specific declarations made by employees under the code.
- **CEO:** The CEO is responsible for ensuring that staff are made aware of the Code of Conduct as part of their induction programme. They will also consider declarations made by the employees under the code and will ensure appropriate action is taken to deal with any alleged breaches.
- **Employees:** All staff employed at the Trust are required to keep to the standards of this code and carry out their duties honestly and fairly. Failure to do so is a serious matter and could result in disciplinary action including dismissal. Staff should therefore read the document carefully and if they have any queries contact their immediate line manager or head teacher.

3 Policy statement

The Trust endorses the Seven Principles of Public Life proposed by the Committee on Standards in Public Life chaired by Lord Nolan. These are:

Selflessness

People who work for the public should take decisions by thinking only of the public interest. They should not do so in order to gain any benefits for themselves, their family or their friends.

Integrity

People who work for the public should not put themselves under any financial or other obligation to any outside person or organisation that might influence them in carrying out their official duties.

Objectivity

In carrying out public duties, including making public appointments, awarding contracts, or recommending individuals for rewards or benefits, choices should only be made on merit.

Accountability

Those working for the public must answer for their decisions and actions to the public and be open to whatever questioning is appropriate to their job.

Openness

People who work for the public should be as open as possible about and give reasons for decisions and actions they take. They should restrict information only when the wider public interest clearly requires this.

Honesty

Those working for the public have a duty to declare any private interests to do with their public duties. They must resolve any possible conflicts of interest in a way which protects the public interest.

Leadership

People who work for the public should promote and support these principles by leadership and example.

The Board of Directors also expect employees to operate in accordance with the codes of conduct provided by their relevant professional body.

4 Standards

- All employees are expected to give the highest possible standard of service to the Trust and to carry out their duties honestly and fairly.
- All employees must report to their head of school, or in the case of an allegation against the head of school the CEO or chair of the board of directors, anything illegal, improper or a breach of procedure. Employees will not be penalised for doing this as long as they act in good faith. The head of school, CEO or chair of the board must record, investigate and take appropriate action on such reports.
- It is not enough for people working for the Trust to avoid doing wrong. All employees should avoid anything which could give the impression or appearance of doing wrong.

5 Safeguarding welfare of children and young people

- All staff are required to work within the 'Guidance for Safe Working for Adults who work with Children and Young People' provided by the local authority and any additional guidance provided by the Trust. This aims to safeguard children and young people and reduce the risk of staff and other adults within the Trust being falsely accused of improper or unprofessional conduct.
- Staff receiving information about allegations of child abuse should report such information to the designated safeguarding lead, as set out in the Trust's Child Protection Policy. If the allegations are against the designated safeguarding lead, the information should be reported to the CEO or chair of the board of directors in accordance with the Trust's Procedure for Dealing with Allegations of Abuse Made Against Staff, Volunteers and Agency Workers.

6 Disclosure of information

- The law requires that certain types of information must be open to councilors, governors, auditors, government departments, service users and the public. An employee should always check first with the head of school if they are in any doubt as to whether the particular information should be released.

- Employees must not use any information they get in the course of their employment for personal gain or benefit. They must not pass information on to others who might use it for their own gain.
- Employees must only give confidential information or documents to those who have a legitimate right to them. They can only give information stored on computer systems in accordance with the requirements of the Data Protection Act 1984, as described in Annex A.
- Employees other than the CEO or Head Teacher should not make statements directly to the press or other media without first obtaining the approval of the CEO, except in the case of trade union representatives who are communicating with the media in that role. CEO should consult with their chair of the board before making statements to the press or other media on major policy issues.

Staff E-Safety Code of Conduct

All teaching and non-teaching staff (including volunteers, suppliers, contractors and temporary staff) are responsible for supporting safe behaviour throughout the Trust and following e-safety procedures. All Trust staff should be familiar with the E-safety and Acceptable use of ICT policy (AUP) as well as their relevance to the Code of Conduct and Safeguarding policies. This is available on the Trinity Academy Newcastle Trust Network and in hardcopy in the Reception Safeguarding Policies Folder.

- All staff should participate in any e-safety training and awareness raising sessions
- All staff should have read, understood and accepted the Staff Acceptable Use Agreement
- Act in accordance with the AUP, Social Media and E-Safety Policy
- Staff should report any suspicion of misuse to the Designated Leads or line manager
- Staff should refrain from making negative comments about learners and Trinity Academy Newcastle Trust on any blogs or social networking sites. Negative comments such as these could be considered as gross misconduct as it potentially affects the reputation of the Trust and/or lowers morale.
- Staff should help educate learners in keeping safe especially with vulnerable groups. Whilst regulation and technical solutions (such as filtering systems) are important, they must be balanced with educating learners to take a responsible approach. The education of learners in e-safety is an essential part of using technology in classes. Staff should act as a good role model in their own use of ICT.
- Where Internet use is pre-planned in sessions or enrichment activities, learners should be directed to sites which are appropriate for their use and procedures should be followed for reporting any unsuitable material that is found on Internet searches. Where practicable staff should pre-check sites and any possible searches.
- Where learners are able to freely search the Internet staff should be vigilant in monitoring the content of websites in case there is any unsuitable material.
- Staff should be aware of the potential for cyber-bullying in their sessions where malicious messages e.g. through the use of forums on the VLE and social networking sites, or via internal class emails or text messages on mobile phones etc, which can cause hurt or distress.

- Learners should be taught to be critically aware of the materials/content they can access online and be guided to validate the accuracy of information.
- Learners are educated to of the need to acknowledge the sources of any information used and to respect copyright when using material accessed on the Internet.

Learners

The provision of ICT resources and facilities are a privilege, not a right. Learners are encouraged to access various technologies in sessions, private study and in the completion of assignments and independent research, and are therefore expected to follow the Trust's AUP. They should fully participate in e-safety activities and report any suspected misuse to a member of staff. Learners are required to sign an agreement to state that they agree to the terms of our AUP and their e-safety responsibilities:

Staff are expected to:

- Behave in a safe and responsible manner
- Treat equipment with respect
- Be polite and not use e-mail, social media or blogs etc to make negative comments, bully or insult others
- Use the resources only for educational purposes

Staff are expected not to:

- Waste resources including Internet and printers
- Eat or drink in the ICT suites
- Use someone else's login details or share your own
- Have any inappropriate files (e.g. copyrighted or indecent material)
- Attempt to circumvent or "hack" any systems
- Use inappropriate or unacceptable language
- Reveal their personal details or passwords
- Visit websites that are offensive in any way
- Use chat rooms or newsgroups.
- Do anything that could damage the reputation of the Trust
- Download anything inappropriate or install any programs

Breaching these Rules may lead to:

- Withdrawal from the Trust's ICT facilities
- Temporary or permanent prevention of access to the relevant pages on the Internet
- Limited or disabled rights where systems are relevant.
- Appropriate disciplinary action. In the case of students of this Trust, the Trust's Behaviour Policy may be invoked.
- Users should note that breaches of the provisions set out in these Rules may lead to criminal or civil prosecution.

Executive Leadership Team

The Executive Leadership team at Trinity Academy Newcastle Trust takes e-safety very seriously and will ensure that policies and procedures are in line with best practice and the safeguarding agenda. In particular, they will ensure that all staff receives suitable training and development to carry out their e-safety roles and sufficient resources are allocated to the task. Senior managers will follow the correct procedure in the event of a serious e-safety allegation being made against a member of staff and ensure that there is a robust system in place for monitoring e-safety. This includes making sure that the Trust's Network infrastructure is safe and secure and those policies and procedures approved within this policy are implemented. Regular review of the issues will take place at the ICT Focus Group meetings with feedback sessions scheduled to the Executive Leadership Team meetings.

Responding to issues

It is important that any incidents are dealt with as soon as possible in a proportionate manner and that members of the Trust community are aware those incidents have been dealt with.

Any concerns around the misuse of ICT must follow the referral process within the Safeguarding Policy and Procedure where there is a potential threat to another learner, vulnerable person or member of staff. Any suspected misuse must be reported to a member of senior staff and then an appropriate course of action will be agreed.

Where it is suspected that any misuse might have taken place by a member of staff will depend on the nature of the misuse and Trinity Academy Newcastle Trust's disciplinary procedure will be invoked.

Where an allegation has been made against a learner an investigation will take place by the designated persons of the ICT Focus Group. The outcome of the investigation will decide what will be the appropriate course of action and depending on the nature of the misuse the learner could be suspended from classes till the investigation is complete. Should the allegation be found to be true, the sanction will depend on the seriousness of the misuse and whether it was accidental or deliberate, a first time offence, thoughtless or malicious e.g. intended to cause harm to others. Sanctions could involve the learner having ICT access removed for a period of time or in very serious cases, exclusion. Where there is a potential legal issue the CEO of the Trust will decide on the need for involvement of outside agencies including the police, together with the designated persons and Executive Leadership Team in line with our Safeguarding and other policies and the chair of the board of directors will be informed.

Trinity Academy Newcastle Trust Guest Wi-Fi Network

Trinity Academy Newcastle provides a guest wireless network which is available to all teaching and non-teaching staff (including volunteers, suppliers, contractors and temporary staff). Use of this provision is governed by the Trust's E-safety and Acceptable Use Policy and by logging onto the network the user is deemed to have agreed to abide by Trinity Academy Newcastle Trust's Acceptable Use Policy.

All users utilising the guest wireless connection should be aware of and agree to conditions of use including but not limited to the following:

- Trinity Academy Newcastle Trust assumes no responsibility for the safety of equipment or device configurations, security, or data files resulting from connection to an Academy's guest wireless network or the Internet, nor liability for any damages to hardware, software or data, howsoever caused.
- Guest wireless access is provided as a free service on an "as is" basis with no guarantee of service.
- Users are responsible for setting up their own equipment to access the guest wireless network. A guide is available to help users connect to the guest wireless network.
- Staff cannot assume any responsibility for personal hardware configurations, security or changes to data files resulting from connection to the guest wireless network. It is recommended that users make a backup copy of any settings before configuring their equipment for use on the guest wireless network.
- Use of the guest wireless internet connection is undertaken at the user's own risk. The wireless network protects users against basic malware/botnet/phishing protection; however, it is the responsibility of the user to protect their wireless devices through use of up-to-date virus protection, personal firewall and any other suitable measures.
- The guest wireless network may be subject to periodic maintenance and unforeseen downtime.
- The Trust filters ALL Internet access.
- Printing access is not available via the guest wireless network. If the user desires to print, they will have to make their own suitable alternative arrangements.
- Any attempt to circumvent Trust procedures or any unauthorised attempt to access or manipulate an Academy equipment or networks, may result in permanent disconnection from the guest wireless network and further disciplinary action being taken.

Academy website

- The contact details on the website should be the academy address, email and telephone number. Staff or pupils' personal information must not be published
- Email addresses should be published carefully, to avoid being harvested for spam (e.g. you could replace '@' with 'AT')
- The Chief Executive Officer will take overall editorial responsibility and ensure that content is accurate and appropriate
- The website should comply with the Trust's guidelines for publications including respect for intellectual property rights and copyright

Publishing Learner's work or images.

- Images that include learners will be selected carefully and will not provide material that could be reused
- Learner's full names will not be used anywhere on the website, particularly in association with photographs
- Written permission from parents or carers must be obtained before images of Learners are electronically published
- Learner's work can only be published with their parent's permission, (see Appendix VI

Mobile Phones

Mobile phones are now a feature of modern society and most of our learners own one. The technology of mobile phones has developed such that they now have the facility to record sound, take photographs and video images. Therefore the trust also recognises the advantages mobile phones have as a ubiquitous learning tool. However, this new technology is open to abuse leading to the invasion of privacy.

Increasing sophistication of mobile phone technology presents a number of issues for academy's:

- They are valuable items that may be stolen
 - The integration of cameras into phones leading to potential child protection and data protection issues. Staff **MUST NOT** use their personal mobile phone to take photographs, videos or any recordings of learners in any circumstance
 - The potential to use the phone e.g. for texting whilst on silent mode
 - Inappropriate messages being sent via SMS, including Cyberbullying and sexual harassment
 - Interruption to lessons and disrupting the learning of others
 - Dependent upon academy/site, phones must always be switched off/put on silent and put away whilst in the classroom. If a learner needs to contact his/her parents/guardians they will use an academy phone in the main office
 - If parents need to contact children urgently they should always phone the academy office
 - The Trust accepts no responsibility whatsoever for theft, loss, damage or health effects, (potential or actual), relating to mobile phones
 - It is the responsibility of staff, parents and learners to ensure mobile phones are adequately insured
 - Dependent upon academy/site, if a learner breaches these rules they may be liable to a sanction, which could ultimately lead to the pupil signing a 'mobile phone' contract. This involves the learner handing in the device at the start of the day and it being returned at the end of the day. If a member of staff breaches these rules then they may be subject to disciplinary proceedings
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Laptops/Tablets

- Staff provided with a laptop/tablet purchased by the academy can only use it for private purposes at the discretion of the CEO. Such laptops/tablets remain the property of the academy and are open to scrutiny by senior management, contracted technicians and the ICT Focus Group.
- Laptops/tablets belonging to the academy must have updated antivirus software installed and be password protected
- Staff intending to bring personal laptops/tablets/mobile devices on to the academy premises should consider whether this is appropriate. There are security risks associated with any private content on the laptop/tablet/mobile device.
- Staff should not attach personal laptops/tablets/mobile devices to the academy network.
- The security of academy laptops/tablets/mobile devices is of prime importance due to their portable nature and them being susceptible to theft
- See Academy Laptop/tablet/mobile device policy (Appendix IV)

6 PERSONAL USE OF SOCIAL MEDIA

All Trust staff should be familiar with the Social Media policy as well as their relevance to the Code of Conduct and Safeguarding policies. This is available on the Trinity Academy Newcastle Trust Network and in hardcopy in the Reception Safeguarding Policies Folder.

- 6.1 Staff members **must not identify themselves as employees of Trinity Academy Newcastle Trust** or service providers for the Trust in their personal webspace. This is to prevent information on these sites from being linked with the Trust and to safeguard the privacy of staff members, particularly those involved in providing sensitive frontline services.
- 6.2 Staff members must not have contact through any personal social medium with any pupil, whether from Trinity Academy Newcastle Trust or any other Trust, unless the pupils are family members.
- 6.3 Trinity Academy Newcastle Trust does not expect staff members to discontinue contact with their family members via personal social media once the Trust starts providing services for them. However, any information staff members obtain in the course of their employment must not be used for personal gain nor be passed on to others who may use it in such a way.
- 6.4 Staff members must not have any contact with pupils' family members through personal social media.
- 6.5 If staff members wish to communicate with pupils through social media sites or to enable pupils to keep in touch with one another, they can only do so with the approval of the Trust and through official Trust sites created according to the requirements specified in section 7 and Appendix A.
- 6.6 Staff members must decline 'friend requests' from pupils they receive in their personal social media accounts. Instead, if they receive such requests from pupils who are not family members, they must discuss these in general

terms in class and signpost pupils to become 'friends' of the official Trust site.

- 6.6.1 On leaving Trinity Academy Newcastle Trust service, staff members must not contact the Trust's pupils by means of personal social media sites. Similarly, staff members must not contact pupils from their former Trusts/School/Academy by means of personal social media.
- 6.8 Information staff members have access to as part of their employment, including personal information about pupils and their family members, colleagues and other parties and school's or County Council corporate information must not be discussed on their personal webspace.
- 6.9 Photographs, videos or any other types of image of pupils and their families or images depicting staff members wearing Trust uniforms or clothing with Trust logos or images identifying sensitive Trust premises (e.g. care homes, secure units) must not be published on personal webspace.
- 6.10 Trust email addresses and other official contact details must not be used for setting up personal social media accounts or to communicate through such media.
- 6.11 Staff members must not edit open access online encyclopedias such as *Wikipedia* in a personal capacity at work. This is because the source of the correction will be recorded as the employer's IP address and the intervention will, therefore, appear as if it comes from the employer itself.
- 6.12 Trinity Academy Newcastle Trust corporate, service or Academy logos or brands must not be used or published on personal webspace.
- 6.13 Trinity Academy Newcastle Trust only permits limited personal use of social media while at work.
- 6.14 Caution is advised when inviting work colleagues to be 'friends' in personal social networking sites. Social networking sites blur the line between work and personal lives and it may be difficult to maintain professional relationships or it might be just too embarrassing if too much personal information is known in the work place.
- 6.15 Staff members must ensure that they set the privacy levels of their personal sites as strictly as they can and to opt out of public listings on social networking sites to protect their own privacy. Staff members should keep their passwords confidential, change them often and be careful about what is posted online; it is not safe to reveal home addresses, telephone numbers and other personal information. It is a good idea to use a separate email address just for social networking so that any other contact details are not given away.

7 USING SOCIAL MEDIA ON BEHALF OF Trinity Academy Newcastle Trust

- 7.1 Staff members can only use official Trust sites for communicating with pupils or to enable pupils to communicate with one another.
- 7.2 There must be a strong pedagogical or business reason for creating official Trust sites to communicate with pupils or others. Staff must not create sites for trivial reasons which could expose the Trust to unwelcome publicity or cause reputational damage.
- 7.3 Official Trust sites must be created only according to the requirements specified in Appendix A of this Policy. Sites created must not breach the terms and conditions of social media service providers, particularly with regard to minimum age requirements.
- 7.4 Staff members must at all times act in the best interests of children and young people when creating, participating in or contributing content to social media sites.



AUP for Staff

ICT and the related technologies such as e-mail, the Internet and mobile devices form part of our daily life within the trust. To ensure that all adults within an academy setting are aware of their responsibilities when using any form of ICT all staff must sign this Acceptable Use Agreement and adhere to its content at all times. This is to ensure staff provides positive role models to learners for the safe and responsible use of online technologies and also safeguard themselves from any potential allegations or inadvertent misuse.

- I know that I should only use the academy equipment in an appropriate manner and for professional use in accordance with the e-Safety Policy
- I will not share my username, password or personal information with anyone else
- I will not leave my computer unlocked, if away from my desk
- I will not give out personal information (mobile phone number, personal e-mail address etc) to learners or parents
- I know I should not use my personal phone to make calls to parents
- I will only use the approved, secure e-mail system (name@trinity.newcastle.sch.uk) for any academy business
- I will make sure that ICT communication with other users is responsible, polite and sensible
- I know that memory sticks are not allowed to be used on academy computers. If I require work to be transferred via memory stick, I can ask the technician to do so.
- I will not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory
- I will ensure academy data is stored securely and used appropriately in accordance with academy and other relevant policies
- I will report any accidental misuse of academy ICT, or accidental access to inappropriate material, to the ICT Subject Leader or Head of Trust Business
- I will not connect any personal device (laptop, digital camera etc), to the academy network without authorisation from the Head of Trust Business
- I will respect copyright and intellectual property laws
- I understand that all my use of the Internet and other related technologies can be monitored and logged and made available to the Head of Trust Business
- Academy equipment should not be used for any personal social networking use.
- Staff must not accept friendships from Learners on personal social network accounts
- Staff must not accept friendships from pupil/ex-pupil under the age of 26 on personal social networking accounts.
- Social Networking applications should not be used to publish any content, which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claims for damages. This includes but is not limited to material of an illegal, sexual or offensive nature that may bring the academy into disrepute.
- Postings should not be critical or abusive towards the academy, staff, Learners or parents or used to place a pupil, staff, or parent at harm.

- Ensure that that the appropriate security/privacy levels are set. Consider all the privacy/security settings available across all aspects of the service – including photos, postings, photographs, bio, etc. Failing to set appropriate privacy levels could result in messages, which are defamatory, libellous or obscene appearing on your profile before you have a chance to remove them.
- I will ensure that my online activity, both in and outside the academy, will not bring myself or the trust into disrepute (this includes postings on social networking sites e.g. Facebook)

I have read, understood and agree to this code of conduct. I will support the safe and secure use of ICT throughout the trust. I am aware I may face disciplinary action if I fail to adhere to it.

Signature: _____ Date: _____

Print Name: _____

7 Political neutrality

- Employees serve their Board of Directors as a whole and must treat all trustees equally and make sure that their individual rights are respected.
- Employees must not allow their own political opinions to interfere with their work.
- Employees may not display political posters, including election material, in areas of Trust premises or other buildings which the public has access to. Trade union representatives may display trade union/association views on current issues on the appropriate authorised notice boards within the Trust.
- Where political views are brought to the attention of pupils within the Trust or during extracurricular activities they should be in the form of a balanced presentation of opposing views.

8 Relationships

- **With trustees:** Mutual respect between employees and trustees is essential to good Trust governance. An employee who believes that a trustee has acted improperly towards them may report the matter to their head of school who will take appropriate action.
- **With the local community and service users:** Employees are expected to be polite, efficient, fair and impartial when they provide services to all groups and individuals within the community they serve.
- **With contractors and suppliers:** All relationships of a business or personal nature outside work with external contractors or suppliers must be declared to the Head of school (Business) at the earliest opportunity on form TANMAT D1 Orders and contracts must be awarded on merit and no special favour should be shown to anyone.

9 Recruitment and other employment matters

- Employees involved in appointing people to posts should ensure that they follow the Trust's Recruitment and Selection Code of Practice.
- In order to avoid any possible accusation of bias, employees must not be involved in any appointment where they are related to or have a close personal relationship outside work with the person applying. Staff shall disclose to the CEO on form TAN MAT D2 any relationship with any person who they know is an applicant for a post at the Trust.
- Employees should not be involved in, or try to influence, decisions relating to discipline, promotion or pay for any employee who is a relative or with whom they have a close personal relationship outside work.

10 Commitments outside work

- Employees' off-duty hours are their private concern as long as they do not:
 - put their private interests before their duty to the Trust
 - put themselves in a position where their duty and private interests conflict or could appear to conflict; or
 - do anything which could adversely affect their suitability to carry out their duties or the reputation of the Trust
- Teaching staff or support staff graded above N6 (or its equivalent) may not carry out any other business or take up any additional employment without the permission of the Board of Directors. Employees should complete form TAN MAT D3 and submit it to the head of school. The Board of Directors will not unreasonably prevent you carrying out other employment. However this employment must not, in the view of the Board of Directors, conflict with its interests and specific conditions may be laid down. The following conditions apply to all commitments outside work:
 - employees must not carry out private work (whether paid or unpaid) relating to the Trust or local authority without permission from the CEO;
 - employees must not carry out any work related to a private interest (including taking or making telephone calls) during normal working hours;
 - an employee must not use the Trust's facilities or equipment or confidential information; and
 - all approvals will be reviewed and may be withdrawn if thought necessary.
- Some staff, particularly teachers, may wish to use their professional expertise to do other work, for example examination marking or private tuition. It is recognised that this can be of value to the Trust. The Board of Directors will not normally prevent employees from undertaking additional employment if it is satisfied that it does not conflict with the interests of or weaken public confidence in the Trust
- The provisions of this section are not intended to apply to trade union officers engaged in legitimate trade union duties and activities.

11 Personal interests

- Employees must declare to the CEO on form TANMAT D4 any financial or non-financial interests that could conflict with the Trust's interests.
- The Academy Financial Handbook requires employees to make a formal declaration about any contract with the Trust where they have a financial interest, as set out in Annex B. Employees should complete form TANMAT D5 and sent this to the CEO. Failure to comply with this is a criminal offence.
- Employees must not be involved in decisions about matters in which they have a personal interest.

- Employees must declare membership of any organisation that is not open to the public, does not have formal membership and has secrecy about rules, membership or conduct. A definition of such an organisation is provided in Annex C. Employees should complete form TAN MAT D6 and sent it to the head of school or, in the case of the head of school to the CEO or chair of the board.

12 Equality

All members of the local community and employees have a right to be treated fairly and equally. Employees must follow the Board of Directors policies on equal opportunities.

13 Tendering procedures

- Employees involved in the tendering process or dealing with contractors should make sure that they know the separate roles of client and contractor. A summary of key legal conditions is provided in annex D.
- Employees must deal fairly and impartially with all customers, suppliers and other contractors and sub-contractors.
- Employees who access to confidential information on tenders or costs relating to contractors must not give that information to any unauthorised person or organisation.

14 Corruption

It is a serious criminal offence under the Prevention of Corruption Acts for employees to corruptly receive or give any gift, loan, fee, reward or advantage or to show favour or disfavour to any person. If an allegation is made it is for the employee to prove that any rewards have not been corruptly gained or given. A summary of the legal provisions appears in Annex E.

15 Use of financial resources

- Employees involved in financial activities and transactions must follow the Trust's financial regulations and guidance.
- They must use public funds in a responsible and legal way, try to make sure that the Trust provides value for money to the local community and avoid legal challenges to the Trust.

16 Gifts and other benefits

- The offer of gifts or benefits in kind to employees (or their partners or family members) arising from their official duties could cause conflict between their private and public interests.
- Unless the exceptions below apply, employees should refuse any personal gift offered to them, their partner or family member by any person or organisation who has dealings with the Trust. Employees must declare any

offer on form TAN MAT.7 and say what action they have taken. This should be given to the head of school, CEO or the chair of the board. The exceptions are:

- gifts made at the end of a courtesy visit to an organisation that are of a promotional nature and of a kind normally given by the organisation;
 - gifts of token value such as diaries, calendars and pens; or
 - gifts of token value given by pupils or parents at Christmas or at the end of term.
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- As offering gifts is a common practice in the business world particularly at Christmas time, they should be refused politely. If, for example, a gift is simply delivered to an employee's place of work, there may be a problem returning it, in which case, it should be immediately reported to the head of school (business) or chair of the board of directors who will decide on the appropriate action.
 - Employees who have a caring role or who provide a direct personal service may come across special problems. For example, parents may wish to say thank you by offering gifts or money. This needs to be handled tactfully. Employees should refuse gifts politely and explain why they cannot accept them. Where it has not been possible to return a gift, this must be reported immediately to the head of school (business) who will give more guidance.

17 Hospitality

- A modest amount of entertainment is a normal part of public life but it is important not to risk undermining public confidence or allow it to appear that it may improperly influence the way employees carry out their duties.
- Employees must be particularly careful if they are offered hospitality by someone who wants to do business with or obtain a decision from the Trust. It is important to avoid any suggestion of improper influence. Employees should accept an offer of hospitality only if they genuinely need to go to an event to receive or give information, represent the Trust in the community or make prior visits to check arrangements, particularly in relation to health and safety (for commercially organised visits, journeys or activities involving pupils). They should only accept offers to attend purely social or sporting occasions if these are part of the life of the community or the Trust should be seen to be represented.
- If hospitality has to be declined, this should be done politely with an explanation of the rules on hospitality.
- Employees should use form TAN MAT D7 to notify all offers of hospitality to the head of school (business) or to the chair of the board if the offer is made to the CEO. This is not required if the hospitality is of token value, for example a single drink.

18 Sponsorship

- The above rules relating to gifts and hospitality also apply where an outside organisation wishes to sponsor or is approached to sponsor a Trust activity. This may be by invitation, tender, negotiation or voluntarily. Employees

should be particularly careful when dealing with current or potential contractors.

- Any employee who, or whose partner or family member, would directly benefit from sponsorship of an activity by the Trust, must declare this on form TAN MAT.5 and send it to the head of school (business) or the chair of the board in the case of the CEO.
- Employees must give impartial advice and avoid any conflict of interest where the Trust gives support in the community through sponsorship, grant aid or financial or other means.

19 Retention and access to declarations

- Declarations made on forms TAN MAT D 1 – 7 are subject to the retention periods set out below:

Declaration	Retention
TANMATD1 Relationship with external contractor or supplier	Kept for 3 years after end of employment
TANMATD2 Relationship with candidate for employment	Kept for 3 years
TANMATD3 Approval for outside interests	Kept for 3 years after end of employment
TANMATD4 Declaration of personal interests	Kept for 3 years after end of employment
TANMATD5 Financial interest in contract	Kept indefinitely
TANMATD6 Membership of secret societies or organisations	Kept for 3 years after end of employment
TANMATD7 Offers of gifts or hospitality	Kept for 3 years

20 Relationship with other policies and procedures

- **Disciplinary Procedure:** This procedure should be used to deal with an allegation against a member of staff that they have acted in breach of this Code of Conduct.
- **Guidance for Safe Working for Adults who work with Children and Young People:** This sets out the Trust's arrangements for safeguarding the welfare of children and young people.
- **Child Protection Policy:** This should be followed if an allegation concerns abuse of a child.

- **Procedure for Dealing with Allegations of Abuse Made Against Staff, Volunteers and Agency Workers:** This should be followed if it is alleged that a member of staff, volunteer or agency worker has abused a child.
- **E-Safety & AUP Policy:** This E-safety and Acceptable Use of ICT Policy (AUP) relates to all members of the Trinity Academy Newcastle Trust community (including learners, staff, volunteers, visitors and contractors) who have access to, and are users of ICT systems and resources both in and out of learning venues where actions relate to an Academy set activities or use of an Academy online systems.
- **Social Media Policy:** The principles set out in this policy are designed to ensure that staff members use social media responsibly so that confidentiality of pupils and other staff and the reputation of the Trust are safeguarded.

Annex A - Data Protection Act

The Data Protection Act aims to protect the public from people not using information held on computer correctly. The Data Protection Registrar oversees the Act but it is up to the Trust and its employees to make sure that they keep to the conditions of the Act.

The basis conditions of the Act are that information held on computer is:

- accurate;
- relevant;
- not excessive for the purposes registered; and
- held for no longer than is needed.

If you are going to give information to someone else, you must make sure that you do this according to the conditions of the act and the conditions of registration. Staff who give out information frequently should make sure they are familiar with the relevant conditions.

Annex B – Academy Financial Handbook Sept 2017, Section 3.2 of the handbook sets out the principles academy trusts must adopt when trading with connected parties.

- 1 If it an employee becomes aware that they have a direct or indirect financial interest in a contract which an academy has entered into or intends to enter into, they must declare this immediately.
- 2 Whilst these provisions do not apply to contracts of employment, the same principles of securing value for money and using public money properly, including managing conflicts of interest, will still apply. Salaries paid should be appropriate to the individual's skills and experience and the salary rates paid in the wider market.
- 3 Academy trusts **must** ensure that any agreement with an individual or organisation referred to in section 3.2.2 to supply goods or services to the trust is properly procured through an open and fair process

Annex C - Organisations to which rules about personal interests apply

Any lodge, chapter, society, trust or regular gathering or meeting, which:

- (a) is not open to members of the public who are not members of that group;
- (b) includes an obligation on the part of the member to make a commitment of allegiance to the lodge, chapter, society or gathering or meeting; and
- (c) includes a commitment of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.

Freemasons are considered to come within this definition.

A lodge, chapter, society, trust, gathering or meeting is not to be regarded as a secret society if it forms part of the activity of a generally recognised religion.

Annex D –Competition Regulations

The following summarises some of the key principles to be observed:

All staff should:

- avoid acting in a way which restricts or prevents competition or is likely to have that effect;
- do nothing that would distort or inhibit competition; or
- treat outside bidders or contractors equally with the academy’s direct service organisation. For example, information given to the direct service organisation about the work which is subject to competition must be made available to all bidders.

Annex E - Prevention of Corruption Acts 1906 and 1916

Under the Prevention and Corruption Acts 1906 and 1916 it is an offence for employees to accept any gifts or other benefits for:

- doing, or not doing, anything in their official capacity; or
- showing favour or disfavour to any person in their official capacity.

Under the Prevention of Corruption Act 1916 any money, gift or consideration received by an employee from a person or organisation holding or trying to get a contract will be treated as corrupt unless the employee proves differently.

Appendix – TANMAT D1



Declaration of relationship with external contract or supplier

“All relationships of a business or personal nature outside work with external contractors or suppliers must be declared to the head of school (business) at the earliest opportunity. Orders and contracts must be awarded on merit and no special favour should be shown to anyone.”

Section 8

Name:			
Job Title:			
Please give details of your relationship with an external contractor or supplier			
Name and Address of External Contractor/Supplier:			
Nature of Relationship:			
Signed:		Date:	
Received by Head Of School (Business) (or Chair of Board):		Date:	

Code of Conduct for Staff Employed in Schools

This form should be forwarded to the Head of School (Business) (or Chair of the Board if this form is being completed by the CEO).

Appendix – TANMAT D2



Declaration of a relationship with a candidate for appointment

“Staff shall disclose to the CEO any relationship with any person who they know is an applicant for a post at the school”

Section 9

Code of Conduct for Staff Employed in Schools

Name:			
Job Title:			
Please give details of your relationship with a candidate for appointment with the academy.			
Name and Address of Candidate:			
Post Applied for:			
Nature of Relationship:			
Signed:		Date:	
Received by CEO (or Chair of Board):		Date:	

This form should be forwarded to the CEO (or Chair of the Board if this form is being completed by the CEO).

Appendix – TANMAT D3



Application for approval of outside interests or employment

“Teaching staff or support staff graded above N6 (or its equivalent) may not carry out any other business or take up any additional employment without the permission of the board of directors.”

Section 10

Code of Conduct for Staff Employed in Schools

Name:			
Job Title:			
Description of outside interest/employment/Directorships:			
Does it involve any remuneration, fee or reward? (if so, give details):			
Location of activities:			
Details of personal involvement:			
Do the activities involve any contact with this Trust (If so, give details):			
I wish to apply for approval of my involvement in the activities outlined above.			
Signed:		Date:	
Received by Chair of the Board of Directors:		Date:	

This form should be forwarded to the Chair of the Board of Directors.

Appendix – TANMAT D4



Declaration of Personal Interests

“Employees must declare to the CEO any financial or non-financial interests that could conflict with the trust’s interests.”

Section 11

Code of Conduct for Staff Employed in Schools

Name:			
Job Title:			
Please give details of your personal interests which may conflict with the Academy’s or local authority’s interests.			
Nature of Interests:			
The interests are:	Financial <input type="checkbox"/>	Non-financial <input type="checkbox"/>	
Signed:		Date:	
Received by Head of School (Business (or Chair of Board):		Date:	

This form should be forwarded to the Head of School (Business) (or Chair of the Board if this form is being completed by the CEO).

Appendix – TANMAT D5



Declaration of Financial Interest

“Section 117 of the Local Government Act 1972 requires employees to make a formal declaration about any contract with the school or local authority where they have a financial interest. Failure to comply with this is a criminal offence.”

Section 11

Code of Conduct for Staff Employed in Schools

Name:			
Job Title:			
Please give details of your pecuniary interests in a contract/sponsorship involving the school or local authority.			
Give details of financial interest:			
Give details of the contract involved:			
Signed:		Date:	
Received by Head Of School (Business) (or Chair of Board):		Date:	

This form should be forwarded to the Head of School (Business) (or Chair of the Board if this form is being completed by the CEO).

Appendix – TANMAT D6



Membership of Secret Societies/Organisations

“Employees must declare membership of any organisation that is not open to the public, does not have formal membership and has secrecy about rules, membership and conduct”

Section 11
Code of Conduct for Staff Employed in Schools

This form should be forwarded to the Head of School, CEO (or Chair of the Board if

Name:			
Job Title:			
Please give details of your membership of a secret society/organisation			
Name and address of Society/Organisation:			
Date of becoming a member:			
Signed:		Date:	
Received by Head Of School, CEO (or Chair of Board):		Date:	

this form is being completed by the CEO).

Appendix – TANMAT D7



Declaration of Offer of Gifts or Hospitality

“Unless the exceptions below apply, employees should refuse any personal gifts offered to them, their partner or family member by any person or organisation who has dealings with the school or local authority. The exceptions are:

- gifts made at the end of a courtesy visit to an organisation that are of a promotional nature and of a kind normally given by the organisation;
- gifts of token value such as diaries, calendars and pens; or
- gifts of token value given by pupils or parents at Christmas or at the end of term.”

Section 17
Code of Conduct for Staff Employed in Schools

Name:			
Job Title:			
Please give details of an offer of a gift, other benefit or hospitality:			
Nature of gifts/hospitality offered:			
Date offer made:			
Have you accepted the offer:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Signed:		Date:	
Received by Head Of School, CEO (or Chair of Board):		Date:	

This form should be forwarded to the Head of School, CEO (or Chair of the Board if this form is being completed by the CEO).

Signed on behalf of the Governing Body:

A handwritten signature in black ink, appearing to read 'P. J. Carter', with a long horizontal stroke extending to the right.

Peter Carter (Chairperson of the Board)

Date: 11.10.17