



**LION ACADEMY TRUST**

inspire • achieve • evolve

# Code of Conduct

## Version History

Version	Date Issued	Brief Summary of Change	Author
September 2016	1 September 2016	First Issue	Human Resources

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Signed \_\_\_\_\_ Date \_\_\_\_\_

Director of Lion Academy Trust

Version: Final

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(Company number 08171341)

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## 1. The Trust purpose

The Lion Academy and Lion Education Trust's (hereafter referred to as the Trust) believe that all children and students have a right to have an outstanding education and access to outstanding facilities in order to give them the best life chances in life irrespective of race, colour, creed or circumstance. The Trust's model is based on high performing schools supporting those schools that are starting their journey. This model ensures that the very best standards of teaching, support services and learning are developed and that schools are equipped to enable all staff and students to make outstanding progress. All schools having high aspirations that exceed expectations for our children, staff and communities embody this core model of practice.

The Trusts believe that obstacles and barriers both real and perceived can be overcome by clear, strategic and targeted support that creates culture change based on sharing good and outstanding practice, collegiality, and a relentless pursuit of excellence. This leads to high expectations and action to provide opportunities for our children in order for them to have high attainment and achieve exceptionally well in all walks of life. We believe that outstanding teaching and learning must be central to every decision made and every development introduced.

## 2. Introduction

In our capacity as Trust's employees, parental advisory body members, directors and proprietors, who for the purpose of this code are referred to hereafter as Governors, we have a duty to behave in a way that reflects well on the Trust, working at all times within the law and according to Trust's procedures. Employees should not deliberately behave in such a way that brings the Trust into disrepute.

The Trust believes all employees and Governors should be treated with courtesy and respect at all times. Everyone is entitled to be treated fairly and staff should endeavour to work both efficiently and safely within the requirements of their contract.

It is important that all employees are made aware on appointment or otherwise and read this Code of Conduct. Deliberate disregard for the Code of Conduct may result in disciplinary action.

This policy does not form part of any employee's contract of employment and may be amended at any time, however a breach of this policy is likely to result in disciplinary action

If in doubt about any aspect of the Code, employees should seek advice from their Head of School/Chief Executive Officer/Deputy Chief Executive Officer or Trust Chair.

### 3. Scope and purpose

- 3.1 This code sets out the standards of conduct expected by all Trust staff. It is not intended to restrict employees in the general exercise of their civil rights as citizens. However, all those carrying out work for or on behalf of the Trust, including Governors, volunteers, agency workers, interim staff, consultants, business partners and contractors (who will be subject to the HR policies and procedures of their own employer) are also required to adhere to the principles of the code.
- 3.2 The Code of Conduct is intended to ensure that all those working for the Trust are aware of standards expected of them and/or the Trust, specifically that they do not commit and are not open to allegations of inappropriate behaviour; favouritism, abuse of authority or conflict of interest.
- 3.3 The Code of Conduct and the associated guidelines should read in conjunction with the seven principles of Public Life, known as the Nolan Principles (**see appendix 1**).
- 3.4 Governors are expected to observe the requirements of the PAB code of conduct in addition to this code.
- 3.5 Teachers are also required to comply with the Personal and Professional Conduct requirements laid down in the Department for Education's most recent [Teachers' Standards](#) document in addition to the Code of Conduct.
- 3.6 The School's disciplinary procedure aligns with this code of conduct. **Failure to observe any of the standards in the code of conduct may lead to disciplinary action, which ultimately could result in dismissal.**
- 3.7 Breaches of the code by workers who are not directly employed by the Trust may be referred to their employer and they may be stopped from working for the Trust with immediate effect. The Trust may reconsider its contractual relationship with contractors/agencies who do not take appropriate action in the event that their workers breach the standards expected in this code.
- 3.8 Breaches of the code by Governors will be dealt with in accordance with the Governance Regulations and advice sought from Governor Services.

### 4. Expectations

- 4.1 Everyone who carries out work for the Trust in any role is seen as the face of the Trust, be they a permanent or temporary member of staff, a contractor, one of our partners or a volunteer.

Everyone working for the Trust:

- is using Trust money and resources in their delivery or support of services to the school community
- must display high standards of behaviour and conduct to instil public confidence in the integrity of the Trust as a whole
- must act and be seen to act in accordance with the trust the public places in them

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- is expected to perform their duties with honesty, impartiality and objectivity and be held accountable for their actions
  - is expected to declare any direct or indirect personal interest which may create, or be seen to create, a conflict of interest with their Trust/School duties
  - is expected to behave in a manner, both at and outside of work that will not bring the Trust's reputation into disrepute.
  - when staff leave a post, they are expected to leave all work related files
- 4.2 It is the duty of all those working for the School in any form to familiarise themselves with this code, seeking clarity if uncertain about any of its content.
- 4.3 All workers have a responsibility to act in a way, which ensures public confidence in their honesty and integrity. Public confidence can be affected by an individual's behaviour. The Trust seeks to maintain the highest standards of public confidence and requires the highest standards of behaviour from its workers. Workers must not conduct themselves in any way which might create doubt about their suitability to work for the Trust, or which has the potential to bring the Trust into disrepute or damage its reputation. Being charged, convicted or cautioned for criminal offences may mean that a worker is unsuitable for employment, even where there is no direct link between the nature of the offence and the work they undertake.
- 4.4 Perceived behaviour is also important in ensuring public confidence and workers must therefore act in a way that also avoids the appearance of any improper conduct or displays a conflict of interest. Workers must be able to demonstrate that their judgment and actions at work are objective and impartial and are not affected or influenced by personal considerations arising from any commitments and/or activities outside work.
- 4.5 This Code of Conduct will be provided to all workers, contractors and agency staff on introduction of the code and for new employees when they are recruited. The code will also be shared with all contractors/agency workers when they are engaged to provide services to the School.

### **5. Respect for others**

- 5.1 Workers must at all times act with the respect that the public and their colleagues are entitled to expect. To develop and maintain a positive, productive and embracing work environment it is important that colleagues treat each other well.
- 5.2 Workers must not pass on to anyone information about colleagues, pupils and their parents/carers unless there is a need for them to have this information in the course of their duties. Guidance should always be sought from senior management.
- 5.3 Workers must treat others professionally and with respect at all times and unlawful discrimination will not be tolerated (**see appendix 2**).

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**6. Declaration of interests**

- 6.1 By declaring interests, workers help maintain public confidence, avoid any suspicion of impropriety and protect themselves against allegations of wrongdoing. Declarations should be made no matter how remote the interest is or if considered by the worker to be insignificant.
- 6.2 Any workers who are in a position to influence decisions which taken by, or on behalf of, the Trust and have any interest in that decision must declare it to Head of School/Chief Executive Officer/Deputy Chief Executive Officer or in the case of Executives, the Chairperson of the Trust Board. Examples of interests where declarations will be needed include where a worker, their family or household members:
- a) Hold a directorship or shareholdings in a company, which either deal with the Trust or operate within the borough.
  - a. Have a relationships in a private/domestic capacity with Trust colleagues, students, contractors or tenderers (see sections 8 and 14)
  - b. Receive direct or grant-aided services from the Trust, which the worker is in a position to influence (beyond universal services such as education).
  - c. Have any significant family or other relationship with governors, clients, contractors or staff working at or with the School/Academy or its partners (see sections 10 and 16).
  - d. Have membership of outside groups in boroughs or groups receiving aid from a local authority (see section 9).
  - e. Have a non-financial interest within the borough such as a school governor or membership of an NHS trust board.
  - f. Have an interest in planning or licensing applications; either in terms of submitting an application or in relation to an application for an adjoining or nearby property, which they have the potential to influence.
- 6.3 It is the responsibility of workers to notify the Head of School/Chief Executive Officer/Deputy Chief Executive Officer or the Chairperson of the Trust Board taking account of any changes in circumstances. Failure to do so may result in disciplinary action.
- 6.4 In addition, staff governors and staff with financial responsibilities are expected to make an annual declaration, whether a null one or not, in line with the DfE's Scheme for Financing Schools.
- 6.5 It is the responsibility of all workers to notify the Head of School/Chief Executive Office/Deputy Chief Executive Officer of any changes to their accommodation arrangements. If they knowingly live in the same household as a disqualified person in accordance with the "Keeping Children Safe in Education, childcare Disqualification by Association Regulations". Failure to do so **may lead to disciplinary action, which ultimately could result in dismissal.**

**7. Reporting responsibilities**

- 7.1 Like all organisations, we have a way of doing things at the Trust which we all need to adhere to because of government legislation - or simply because it's the way that the

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Trust has chosen to do business. The way we do things is often referred to as governance but could be more simply described as 'doing the right thing.'

Our governance framework is set within the Trust's constitution. The governance related advice makes it easy for you to do everything to standard and to escalate if something goes wrong.

- 7.2 Workers must ensure that they act at all times within their delegated authority as set out within the Trust's articles of association, schemes of management and scheme of financial delegation.
- 7.3 Workers must not make decisions (financial or non-financial) where they have no delegated authority to do so.
- 7.4 In addition to declaring interests (as in 6 above) all workers **must** immediately inform the Head of School/Executive Principal (if it is the Head of School that is the worker)/Chief Executive Officer/Deputy Chief Executive Officer in writing of all police cautions, warnings, reprimands, arrests and/or convictions received during their period of employment/engagement with the Trust. This information will be treated in confidence and used to assess any impact on the worker's job, including the appropriateness for the worker to continue in their role. A caution, warning, reprimand, arrest or conviction **will not** automatically mean that a worker is unable to continue in their job. Whether there is a conflict with the workers job will depend on a number of factors including the nature of the offence, the type of job, the seniority of the worker and the extent to which the Trust's reputation or interests are damaged.
- 7.5 All workers have a duty to report any suspicion of fraud, theft, corruption, bribery or other wrongdoing by members of the public or Trust workers including colleagues, managers, governors, contractors, volunteers or partnership workers. Suspicions should be reported to the Head of School/Executive Principal/Chief Executive/Deputy Chief Executive, the Trust Chair, or in absolute confidence by following the Trust's whistleblowing procedure.
- 7.6 The Trust will not treat anyone less favourably because they have reported or intend to report wrongdoing, unless the complaint is malicious. Workers treating colleagues unfavourably in such circumstances will be liable to disciplinary action which could result in dismissal, as will workers who make malicious allegations. Non-Trust employees will be referred to their employer and/or their services stopped.

### **8. Political neutrality and activity**

The following conditions apply to all those working for or on behalf of the Trust:

- 8.1 Personal political opinions must not interfere with providing balanced professional advice by/to Managers/Governors. Governors/Workers must not allow their political views to influence service delivery, nor must they impose those views on service users or colleagues.
- 8.2 Governors/ Workers who intend to undertake political activities should ensure that they are not in a role restricted, workers should seek written confirmation (email is considered sufficient) from their Head of School/Executive Principal/Chief Executive Officer/Deputy Chief Executive Officer/Chair of Governors.

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- 8.3 If a governor or member of staff intends to stand for election as a member of parliament or a Councillor for any authority they should advise their Head of School/Executive Principal/Chief Executive/Deputy Chief Executive or Trust Chair in writing. Failure to do so may lead to disciplinary action being taken, which could result in dismissal.  
*\* If Chair of Governors intends to stand they should inform the Trust Board.*

**9. Membership of other bodies**

Workers are expected to consider carefully whether membership of, or association with, clubs, societies and other organisations such as lobbying groups and voluntary bodies could lead to the impression that their official position might be used to promote a private or personal interest or undermine equalities. If there is a chance that it could, they should declare it.

- 9.1 The Trust's nominated monitoring officer\* will maintain a register of staff and Governors that belong to such organisations: membership must be declared to them.  
*\*employees should inform their Office/HR Manager and Governors should inform the Trust Governor Services provider.*

- 9.2 Workers and Governors must in particular declare to the monitoring officer membership of any organisation or body, which is or could be regarded as being:

- a) A secret society
- b) Discriminatory (**see Appendix 2**)
- c) in a contractual or potential contractual relationship with the Trust
- d) in receipt of benefit in cash or in kind from the Trust.

- a) 9.3 For the purposes of this code a secret society as mentioned in 9.2 is defined as one that is not open to members of the public who are not members of that lodge, chapter, society, gathering, meeting or trust
- b) Places an obligation on the part of the member to make a commitment (by oath or otherwise) of allegiance to the lodge, chapter, society, gathering, meeting or trust.

- 9.4 The freemasons can be cited as the obvious example of a secret organisation but workers are asked to consider whether their membership of any group or body might fall within the definition set out above. If in any doubt they should discuss this matter with their Head of School/Executive Principal/Chief Executive Officer/Deputy Chief Executive Officer.

- 9.5 A lodge, chapter, society, trust, gathering or meeting as defined above should not be regarded as a secret society if it forms part of the activity of a recognised religion, trade union or professional association.

\*The Trust/School within the trust have monitoring officers (see section 9.1 above) who maintains a register of staff that belong to such organisations mentioned above and membership must be declared to them. If you are uncertain who the monitoring officer is please speak to your Head of School/ Chief Executive Officer/Deputy Chief Executive Officer.

**10. Misuse of position**

All workers must maintain the highest standard of integrity in all relationships both inside and outside the School.

- 10.1 Anyone working for the Trust must not, either in their professional or personal capacity, use their position improperly to gain an advantage or disadvantage any person or organisation.
- 10.2 If a worker is in a position to influence any decisions which are taken by, or on behalf of, the Trust and they have any interest in that decision, however remote, they must declare it; this includes membership of voluntary bodies who could be receiving Trust grants.
- 10.3 No special favour may be shown to current or former colleagues or their partners, friends, relatives or associates when awarding contracts to private or other businesses run by them or who employ them in any capacity.
- 10.4 Workers must ensure that they declare to their Head of School/Chief Executive Officer/Deputy Chief Executive any personal interest, which may impinge on their impartiality to apply these regulations. Any arrangements which might, in the long term, prevent (or be seen to prevent) the effective operation of fair competition must be avoided.
- 10.5 Workers must not lobby members of the Governing Body on individual or personal employment matters including those associated with recruitment of themselves or others.

**11. Safeguarding**

The Trust is committed to safeguarding children and vulnerable adults and expects exemplary behaviour and work in relation to safeguarding. All workers have a duty to safeguard and promote the welfare of children, young people and adults at risk.

- 11.1 When recruiting to posts affording access to children and vulnerable adults managers/Governors must follow the Trust's procedures to ensure safe recruitment.
- 11.2 All workers are required to ensure they are familiar and compliant with the relevant national and Trust professional boundaries, codes of practice and legislation related to their job including data protection, safeguarding & child protection policies.
- 11.3 All workers are expected to report any concerns of a safeguarding matter or acts/suspicion of abuse against children or vulnerable adults irrespective of whether this is inside or outside of work.

**12 Finances and the use of Trust and other public resources**

Workers must use Trust's funds responsibly and lawfully and only for their designated purposes.

- 12.1 It is a criminal offence to defraud the Trust or its customers or partners: any such activity will be reported to the relevant authority (such as the police or HMRC) and the worker will be subject to disciplinary action which may result in dismissal.

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- 12.2 Trust facilities may not be used for workers' personal or outside interests without prior agreement. This includes, but is not limited to, funding, buildings, vehicles, furniture, tools, telephone lines and internet connections, ICT equipment. Minimal personal use of low value resources, for example using the internet during lunch breaks, is allowed (see section 13.3 below).
- 12.3 Intellectual property, including research, reports, designs, drawings, software, etc created for work purposes are the property of the Trust. They should never be removed from the workplace without the permission of the Head of School/Chief Executive Officer/Deputy Chief Executive Officer. The only exception to this is when staff take things home in order to work on them, which is permissible so long as the property is returned to the Trust upon completion of the work and where appropriate, the employee's line manager has authorised this.
- 12.4 All workers have a general responsibility for ensuring that the Trust's assets under their control are secure and that use of these assets is legal, properly authorised and achieves good value for money. All expenditure incurred should be compliant with the Trust's Financial Regulations, Financial Procedures, Contracts Handbook, Tenders and Contracts Regulations. Workers must also ensure that they act within the Trust's Scheme of Financial Delegation and only approve expenditure where they have been delegated the appropriate authority to do so.

### **13. Communications, electronic media and social networking**

The Trust uses a variety of methods to communicate with its workers, students, service users and the community and to deliver services, including external and internal post and telephones, photocopying and printing, fax, email, internet and intranet. These facilities are provided for Trust's business purposes only. Communications using Trust facilities may be intercepted, recorded and monitored for business use and where appropriate for the detection and prevention of crime. This includes, but is not limited to, telephone calls, internet use, email and post.

- 13.1 The standards set out in this code apply to the use of electronic media such as email, internet, blogs and social networking sites the same as they would to traditional media such as newspapers, television and radio.
- 13.2 Workers must abide by Trust policies and procedures relating to the security of information, data protection and use of electronic media, including email and the internet.
- 13.3 Any use of social media such as Facebook, Twitter, LinkedIn, etc., during working time should be restricted to work related use only. Personal use of these types of sites and access to personal email is not permitted during worktime.
- 13.4 Whether at work or not, workers must not use social media to:
- post information which is confidential or which constitutes intellectual property
  - make negative comments about the Trust or Schools within the it, its services, workers, customers or anyone linked to the Trust
  - harass or bully other workers (cyber bullying)
  - make discriminatory comments of any kind about anyone linked to the Trust

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- post pictures or details of Trust students or colleagues without their express permission.
  - communicate with students.
- 13.5 Workers must not;
- use their personal telephones (mobile or landline) to communicate with students and should only use Trust systems for any such communication; or
  - provide students with their personal telephone numbers unless given express consent to do so by their Head of School/Executive Head/Deputy CEO.
- 13.6 Workers must notify the Head of School/Executive Head/Deputy CEO immediately if a student attempts to contact them on their personal telephone or via a social network

### **14. Confidentiality and data protection**

The definition of what constitutes a confidential document is wide. Workers are required to take their duty of confidentiality seriously and ensure the confidentiality of all information. All workers need to be mindful of the requirements of the Data Protection Act and should familiarise themselves with the Trust's policies in this regard which are available on request.

- 14.1 The confidentiality of all information received at work must be respected and never be used for personal advantage or gain. Information given out in the course of a workers duty must be true and not misleading.
- 14.2 Workers with access to confidential information should not disclose that information to any other party or organisation unless authorised to do so. This is particularly important in the case of information relating to action taken in relation to conduct, capability, procurement, tender and contract costs (including those for in-house providers).
- 14.3 Access to information may be allowed to those who have a legal entitlement; such as the police as part of a criminal investigation. Workers providing such information have a duty to verify the identity of the person or organisation requiring the information.
- 14.4 If a worker is unsure whether information can be disclosed they should seek confirmation from the Head of School/Chief Executive Officer/Deputy Chief Executive Officer.
- 14.5 Workers must not transfer any information to their private email addresses without the prior knowledge or consent of their manager.
- 14.6 Workers have a responsibility to ensure that electronic and paper data and information is kept secure at all times. Confidential information should not:
- be left unattended if being taken between home and work or between work places;
  - be taken to entertainment or public places, such as cafés, restaurants, pubs and cinemas;
  - be discussed where there is a possibility of being overheard.
- 14.7 Loss and misuse of information and data is a serious offence and is likely to result in disciplinary action which may lead to dismissal.

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- 14.8 Misuse by a worker on leaving the Trust will be addressed through legal routes.  
(Also see section 25 for contact with the media)

**15. Personal financial affairs, data and pay**

Workers must not conduct their personal financial affairs so that the Trust or another public body is defrauded or is otherwise denied the income and/or other resources to which it is entitled by law.

- 15.1 Workers have a responsibility not to be in debt to the Trust for any reason. In the event that such debt arises through genuine error or mistake, workers are required to make arrangements acceptable to the Trust for repayment of the debt.
- 15.2 Workers should check their pay on every payment occasion, reporting any anomalies to their Head of School/Chief Executive Officer/Deputy Chief Executive Officer immediately. Overpayments and underpayments will be rectified or made good. It is in the worker's interests to have this arranged as soon as possible.
- 15.3 Income tax is a personal responsibility and the Trust will not be liable for any underpayment of tax. It is each individual's responsibility to ensure that the tax code on their pay slip is correct and any errors should be reported as soon as possible.
- 15.4 It is the personal responsibility of every worker to ensure the Trust has their up to date personal contact details. Personal contact details may be needed for a variety of business reasons including consultation, informing of contractual changes, and contact during periods of absence and/or in an emergency. The Trust will not be held responsible for a worker's failure to update their own information. Changes should be reported to the appropriate School/Trust officer.

**16. Relationships**

Workers are expected to develop and maintain a co-operative and professional working relationship with governors, colleagues, contractors, suppliers and service partners at all times.

Personal relationships often develop in the work place and these can cause a number of issues for the Trust, the wider workforce and the individuals concerned. All our workers should feel confident of fair and consistent treatment without the fear that a relationship will influence their or other workers' treatment or wider working relationships.

- 16.1 **Governors:**  
Workers are responsible to the Governing Body through its senior managers. Mutual respect between workers and Governors is essential to good governance. Familiarity must be avoided to ensure the relationship retains a professional balance. Workers must not approach Governors over personal employment issues and doings so may be regarded as an abuse of position as referred to in section 10.
- 16.2 **Contractors and suppliers:**

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Workers must declare any external relationships of a business or private nature with external contractors or suppliers or potential contractors and suppliers to the monitoring officer.

- 16.2.1 Workers who authorise, engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a business or private relationship with a contractor who is engaged or who is proposed to be engaged by the Trust, should declare that relationship to the monitoring officer as soon as practicable. The monitoring officer should declare any interests to the Head of School/Chief Executive Office/Deputy Chief Executive officer.
- 16.2.2 When tendering, workers must declare any interest (and interest of their spouse, partner, family member, friend or associate), business or private relationship or association with any Trust contractor or potential contractor.

### **17. Parents, carers, students (service users) and the community**

Workers should always remember their responsibilities to the community they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community.

Workers must maintain professional boundaries and avoid developing inappropriate personal relationships with service users. In particular, the development of unprofessional personal relationships or friendships with vulnerable service users, such as borrowing and lending money, giving and receiving monetary or extravagant gifts, sexual intimacy, or showing preferential treatment to service users will be regarded as a misuse of position no matter how well intended. In exceptional circumstances, such as where a pupil has to be lent money to cover their fare home, the loan will be acceptable but the worker lending the money must declare it immediately to their Head of School/Chief Executive Officer/Deputy Chief Executive Officer.

### **18. Work colleagues**

Personal relationships (such as family, intimate or close personal friends) between people in the same team, division or department, or between a line manager and one of their team or other person they may have influence over, are potentially problematic and should be avoided where possible, or managed appropriately where it cannot be avoided.

- 18.1 Relatives, spouses, partners or close personal friends are not allowed to be involved in the processes and decisions relating to employment issues, including but not limited to: appointment, performance; discipline; authorising financial payments; determining pay or conditions of employment.
- 18.2 Workers responsible for the appointment of staff must ensure that decisions are based on merit and not on anything other than ability to do the job. Similarly, they must not canvass on behalf of any applicant. If a candidate is known to a worker but is not a relative, spouse, partner or close personal friend, they may sit on the interview panel, but must declare the relationship to other members of the panel prior to the interviews. This applies to the appointment of permanent and temporary staff, including agency workers and consultants.

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18.3 Workers must declare any personal relationships that exist or develop, in the circumstances detailed in 18.1 and 18.2 above, they must report this to their Head of School/Chief Executive Officer/Deputy Chief Executive Officer/Trust Chair.

18.4 Abuse or misuse of a relationship is likely to invoke disciplinary action, which may lead to dismissal.

### **19. Gifts and hospitality**

To maintain integrity, reduce vulnerability and comply with the Bribery Act 2010 (<http://www.bis.gov.uk/anticorruption> ) the Trust will not tolerate any form of bribery by, or of, its workers or anybody acting on behalf of the Trust.

19.1 The Trust's policy regarding gifts & hospitality should be read in conjunction with this code of conduct as there are strict processes for receiving and rejecting offers of gifts and hospitality. The Head of School/Chief Executive Officer/Deputy Chief Executive Officer is responsible for deciding individual cases, in conjunction with the Trust Chair.

### **20. Staff dress code**

The Trust recognises the rights of workers to choose what they wear and how they appear. However, as role models workers need to set an example to our pupils. This is why standards of dress and personal presentation are important for all employees with the Trust.

20.1 The Trust guidance regarding staff dress and professional behaviour should be read in conjunction with this code of conduct.

### **21. Business Expenses**

The environmental and cost impact of different modes of transport must be considered when deciding whether to attend off site meetings. The Trust policy regarding travel and expenses claims must be read in conjunction with this code of conduct.

21.1 Trust workers are permitted to claim limited reasonable expenses for certain travel and related costs incurred in the course of their employment as detailed in the Trust's procedures.

21.2 Workers are responsible for ensuring that any expenses incurred during the course of their work are kept to a minimum and are authorised in advance unless it is impractical to do so. When travelling by public transport, workers are expected to travel using the cheapest fare available, unless authorised otherwise in advance. Under no circumstances should workers claim for home to work travel.

21.3 The standards relating to expenses apply in the same way irrespective of whether the expenses incurred are funded externally.

21.4 Workers who are provided with mobile phones are responsible for identifying and paying for all call or other charges relating to any personal use of the equipment.

### **22. Alcohol and drugs**

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Workers in possession of illegal drugs or using illegal drugs whilst at work will be reported to the police and subject to disciplinary action, which may result in dismissal.

- 22.1 The use of alcohol and/or drugs must not impair the performance of contractual duties and safe, efficient and effective service delivery.
- 22.2 With the exception of work-related events, where provision of alcohol has been authorised, alcohol must not be consumed during working hours.
- 22.3 Alcohol, drugs or substances consumed outside of or during working hours must not affect a worker's ability to do their job or have the potential to damage the Trust's reputation or the worker's own credibility. Presenting for work with clothing or breath smelling of alcohol or drugs is likely to raise reputational concerns that may lead to disciplinary action.
- 22.4 Workers deemed to be under the influence of any substance likely to compromise safety or service delivery may be subject to drug and alcohol testing and/or disciplinary action which may result in dismissal.
- 22.5 Workers who suspect a colleague of being under the influence of alcohol and/or drugs at work must report this to their line manager or to a more senior manager if it is their line manager under suspicion.
- 22.6 The Trust's drug and alcohol policy aligns with this code of conduct.

### **23. Smoking**

The Trust recognises that the health, safety and welfare of children, workers, sub-contractors and anyone else directly affected by the Trust's operations are of prime importance. The Trust also recognises that employees are often seen as role models to pupils.

- 23.1 Smoking is therefore strictly prohibited on all parts of the Trust's premises, including at entrances or anywhere on its grounds. This includes areas that are outside but that form part of the Trust's premises.
- 23.2 The Trust does not permit workers to smoke in Trust vehicles.

### **E-Cigarettes**

- 23.3 Although they fall outside the scope of smoke-free legislation, the Trust prohibits the use of e-cigarettes in the workplace and the same restrictions on smoking will also apply to e-cigarettes. The Trust's rationale for a ban on e-cigarettes is that:

- although they do not produce smoke, e-cigarettes produce a vapour that could provide an annoyance or health risk to other workers;

- some e-cigarette models can, particularly from a distance, look like real cigarettes, making a smoking ban difficult to police, and creating an impression for children/visitors/customers/other workers that it is acceptable to smoke.

23.4 Non-compliance with the Trust's smoking policy is likely to invoke disciplinary action, which may lead to dismissal. For further details please refer to the Trusts smoking policy.

## **24. Additional work**

The Trust recognises that off duty hours are the personal concern of individual workers, however workers should not allow their private interests to take priority over their work interest. Workers should not put themselves in a position where their duty and private interests conflict. Private interests in this regard include activities of a voluntary nature as well as business or recreational interests. This does not preclude tuition outside of normal work hours.

24.1 It is not the intention of the Trust to prevent workers from undertaking additional employment unless that employment conflicts with or detrimentally affects the Trust's interests, weakens public confidence in the conduct of the Trust's business, or affects a worker's ability to undertake their work.

24.2 A worker who wishes to take on any kind of additional work, paid or unpaid, in any capacity, must ensure that:

- a) Where there is a potential conflict of interest for the Trust they inform their Head of School/Chief Executive Officer/Deputy Chief Executive Officer in writing for assessment.
- b) their combined working arrangements do not exceed the provisions of the working time regulations for weekly working hours, allow for the daily and weekly rest required by working time regulations or cause other concern in terms of health and safety at work.
- c) the work does not place them in a position where their Trust duties and private interests conflict
- d) the work does not damage public confidence in the Trust 's conduct or business
- e) the work does not involve being in direct competition with the Trust for contracts/work
- f) any potential employer is made aware that they are already employed by the Trust.

## **25. Contact with the media**

Although an open and transparent organisation, the Trust restricts workers from making public comment on issues relating to the Trust as they might be deemed to have been made on behalf of the Trust.

25.1 Workers are not allowed to discuss issues with the press or public or disclose information or documents on Trust business unless expressly authorised to do so by the Head of School/Chief Executive Officer/Deputy Chief Executive Officer or the Trust Chair. Unless authorised to do so, workers must not speak, write or give interviews to the media. If

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## CODE OF CONDUCT

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approached by the media, workers should refer the enquiry to the Head School/Chief Executive Officer/Deputy Chief Executive Officer.

- 25.2 The branch secretaries or corporate staff side leads of the recognised trade unions have specific permission to liaise with the media on behalf of their respective trade unions.
- 25.3 Trust workers should not bring the Trust's name into disrepute by publicising any material that is against the interests of the Trust or is defamatory to representatives, Governors, partners, pupils or work colleagues.
- 25.4 The standards set out in this document apply in the same way to information published and comments made through electronic media including email, the internet, social networking sites and blogs, as they do to traditional written media, newspapers, radio and television.
- 25.5 The Trust's communications policy, which outlines the procedures for addressing the media, is aligned with this code of conduct. Any breaches is likely to invoke disciplinary action, which may lead to dismissal

### **26. Working hours**

- 26.1 Trust staff are expected to work the number of hours set out in their contract of employment. All staff are expected to be punctual.
- 26.2 If employees are unable to work because of sickness they must inform the appropriate person by the agreed time in the agreed manner as laid down in the Trust's Sickness Absence procedure.

### **27. Further information**

If you are in any doubt with regard to the provisions of this code and how they apply in any particular situation, you should seek advice from your Head of School/Chief Executive Officer/Deputy Chief Executive officer or Trust Chair.

**Appendix 1:**

**The Nolan Principles**

The Seven Principles of Public Life, known as the Nolan Principles, were defined by the [Committee for Standards in Public Life](#). They are:

- **Selflessness** - Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
- **Integrity** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
- **Objectivity** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **Accountability** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Openness** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.
- **Honesty** - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** - Holders of public office should promote and support these principles by leadership and example.

## Appendix 2: Standards of Behaviour

### Standards of behaviour

All Trust workers are required to be aware of the Trust's equalities and diversity policies and to comply with and implement them in all aspects of their work.

All workers, volunteers and customers are entitled:

- to be treated with dignity, respect, courtesy and fairness
- not to be bullied, harassed or victimised
- not to experience any form of unlawful discrimination

The Trust will not tolerate unfair, offensive or unlawful discriminatory behaviour or bullying. Workers must not engage in such behaviour, which may be regarded as a serious disciplinary offence which could lead to dismissal.

### Discrimination and offensive behaviour

By law people are protected from discrimination on the grounds of protected characteristics listed in the Equality Act 2010:

- race
- sex
- disability (or because of something connected to a disability)
- religion or belief
- age
- sexual orientation
- gender reassignment
- pregnancy or maternity
- being married or in a civil partnership

Discrimination can take a number of different forms:

- Treating a person **worse** than another person because of a protected characteristic (this is called **direct discrimination**).
- Doing something, which has (or would have) a worse impact on a person and on other people who share a particular protected characteristic than it has on people who do not have the same characteristic. This form of discrimination may not be unlawful if it can be shown to be **objectively justified**.
- Treating a person **unfavourably** because of something connected to their disability where you cannot show that what you are doing is **objectively justified**. This is called **discrimination arising from disability**.
- Treating a person worse than another person because they are **associated with** a person who has a protected characteristic.
- Treating a person worse than another person because you think they have a protected characteristic (**perception**).
- Treating a person badly or **victimising** them because they have complained about discrimination or helped someone else complain or have done anything to uphold their own or someone else's equality law rights.

**Harassment:** often related to bullying, this is unwanted behaviour towards another person, that:

- has the effect of violating that persons dignity or

- creating for that person an intimidating, hostile, degrading, humiliating or offensive environment.

The unwanted behaviour may be related to a protected characteristic or be of a sexual nature. It may also be less favourable treatment because of submission to or rejection of previous sex or gender reassignment harassment.

Any unwanted, unwelcomed and unreciprocated behaviour which undermines a person's dignity/feelings at work is unacceptable to the Trust. This includes behaviour which might unreasonably threaten a person's job security or promotion prospects or create an intimidating working environment.

If any behaviour towards a person working for the Trust from another person at work including a customer, Governor or contractor has overtones which the recipient reasonably finds offensive, the recipient has the right to have it stopped.

Unacceptable behaviour can take many different forms and can range from physical attack to more subtle conduct. It includes: actions, jokes, or suggestions which might create a stressful working environment and; the production, distribution, display or communication and discussion of material such as books, posters, magazines, newspaper articles, photographs, videos, computer generated imagery, social media sites etc which may give rise to offence.

Unacceptable behaviour does not include legitimate actions by a manager to encourage a worker to perform their duties or manage their performance. It also excludes legitimate actions taken within disciplinary or other formal procedures. It does not exclude persons in authority who use their position to bully, abuse or harass others, or who assume a threatening or intimidating management style.

There is no definitive explanation of what constitutes offensive behaviour. The effect it has on the recipient is what defines it as offensive. This following list can therefore only be used as a guide to help workers understand what behaviour could be deemed offensive, whether it is intentional or not. The examples are indicative and not exhaustive.

<b>Type</b>	<b>Description</b>	<b>Examples</b>
<b>Sexual harassment</b>	Unwelcome sexual advances, requests for sexual favours or other conduct of a sexual nature which makes the recipient feel threatened or compromised. This means any harassing conduct based on gender or sexuality.	Gestures, leering, getting too close, bringing in offensive publications, writing offensive letters or memos, making unwanted propositions, telling sexually explicit jokes, groping, indecent exposure
<b>Racial harassment</b>	Derogatory remarks, racially explicit statements, graffiti, jokes or any other action of a racist nature which results in the recipient(s) feeling threatened or compromised.	Gestures, facial expressions, offensive publications, graffiti, threats, racial abuse, racist jokes, nicknames, labels, assault.
<b>Disability harassment</b>	Derogatory remarks, staring, mimicking, invasive personal questions, ostracising or patronising which is directed at any individual with a disability, or groups of disabled people, which	Mimicking, ignoring wishes or feelings, ostracising, staring, laughing at a disability, copying a speech impairment, inappropriate terminology ( e.g. cripple or spastic, personal questions, jokes, patronising comments, nicknames, unwanted moving of a wheelchair,

<b>Type</b>	<b>Description</b>	<b>Examples</b>
<b>Religious harassment</b>	<p>belief Behaviour which fails to acknowledge and respect the rights or needs have people's religious beliefs or practices.</p>	<p>hiding a disability aid, touching a visually impaired person.</p> <p>Mimicking, staring, drawing offensive symbols , hanging offensive images, making fun of headgear (e.g. skull cap, turban , hijab) criticism for taking religious holidays off, offensive name calling, assault, removing religious objects</p>
<b>Equality-related conflict</b>	<p>The School recognises that people have the right to hold different religions and beliefs and will make reasonable provisions to help employees practice their religion or belief e.g. through flexible working hours and providing a quiet area for prayer.</p> <p>Practicing a religion or belief at work in a way that may cause offence or treats people differently because of their protected characteristic is unacceptable and may also be unlawful.</p>	<p>An employee shares a workstation with a gay man who openly discusses his lifestyle and relationship with another man. The employee requests to move on the basis that her religion regards such behaviour as sinful and contrary to the laws of her God. Such a request may be perceived as offensive towards the gay man.</p> <p>Some individuals may be guided by their religion or culture not to shake hands as a greeting. To avoid causing offence individuals should ensure that they greet all people in the workplace in the same way, irrespective of their race, gender, age, religion, sexual orientation etc.</p> <p>A counsellor declines to provide a service to a same-sex couple on the grounds that such relationships are immoral according to his religion. Such behaviour conflicts with the Council's statutory duty to eliminate discrimination and promote equality and is not acceptable.</p>
<b>Age harassment</b>	<p>Ridiculing or demeaning behaviour focused towards people because of their age</p>	<p>Mimicking, excluding from social functions/information, making fun of age, questioning ability , setting unrealistic challenges, deliberate body contact</p>
<b>Sexuality harassment</b>	<p>Behaviour which condemns or ridicules people because of their sexuality</p>	<p>Offensive letters/memos , threats, insults, jokes or comments, personal questions, gestures, starting fights, deliberate body contact, practical jokes, verbal abuse</p>
<b>Harassment related to gender reassignment</b>	<p>Behaviour which condemns or ridicules people because of their gender reassignment</p>	<p>A transsexual woman is subjected to offensive 'banter' at work, relating to her gender reassignment. This creates a hostile and offensive atmosphere for her, and is likely to be harassment</p>
<b>Bullying/Singling out</b>	<p>Bullying often results from a misuse of management power, but it can also be the misuse of any form of individual power, such as physical strength,</p>	<p>Ostracising/freezing out, withholding essential information, resources or training, setting impossible tasks, needlessly changing priorities or objectives, unreasonable allocation of duties, deliberate wrongful attribution of blame,</p>

Type	Description	Examples
	personality or age, or collective power through strength of numbers. More than a strong or authoritarian management style, it is destructive rather than constructive, it is criticism of a person rather than their mistakes, it publicly humiliates rather than privately corrects them and it results in them feeling threatened or compromised.	shouting, swearing, abuse, nicknames, malicious gossip, public reprimanding or humiliation, belittling or patronising comments, persistent reminders of past failures, unnecessary phone calls to someone's home, hitting or grabbing a person, pushing, jostling, practical jokes, initiation ceremonies, damaging or stealing property.
<b>Victimisation</b>	Where a person is treated less favourably than another because he/she has brought proceedings, given evidence or information, rejected advances or complained about the behaviour of someone who has been harassing, discriminating against, or in some other way intimidating them.	A worker helps a colleague with a sexual harassment complaint against another worker. Because of this, their manager marks them down at their annual appraisal on the basis they are 'not very loyal'.

## How to Complain

If a worker is personally subject to behaviour, which is against the Trust's standards of behaviour, they should discuss this with the person concerned to try to resolve the issue informally. If a worker feels that informal resolution is not possible or appropriate they may raise a formal complaint via the Trust's grievance procedure. The complaint will be investigated and disciplinary action taken if the allegation is proven.

If a worker witnesses behaviour which is against the Trust's standards of behaviour they should initially try to resolve the matter informally with the person concerned. If they do not feel that informal resolution is possible or appropriate they should raise the matter with a senior manager such as the Head of School/Chief Executive Officer/Deputy Chief Executive Officer.

## Responsibilities

### It is the Trust's responsibility to:

- support the principles and practice of equality and diversity policies
- ensure that Trust services are available to all members of the community
- treat all workers and customers with dignity and respect
- ensure the Trust's commitments are communicated effectively
- ensure that senior management observes their responsibilities in that behaviour towards staff at all levels does not involve any form of harassment or discrimination.
- arrange for provision of specialist advice and training for managers and staff at all levels
- ensure that the Trust has equalities and diversity policies and set guidelines for the operation of those policies.
- review, revise and ensure implementation and monitoring of policies and procedures

### It is the Head of School's/Chief Executive Officer/Deputy Chief Executive Officer responsibility to ensure that:

- the Trust's commitment to equalities and diversity is communicated

- that they and their staff comply with the Trust's standards of behaviour
- all managers apply policies and practices fairly and consistently
- services provided are available to all members of the community
- speedy and appropriate action is taken to deal with offensive behaviour

**It is all workers' responsibility to:**

- understand what the standards of behaviour required of them  
make sure that their own conduct does not cause offence or misunderstanding
- stand up to behaviour that they find unacceptable
- support colleagues who are being harassed, bullied, victimised, or being discriminated against

**It is all managers' responsibility to:**

- treat all workers and customers with dignity and respect and be alert to, and correct, unacceptable behaviour within the workplace
- ensure that all workers and volunteers are aware of the standards of behaviour required of them and know how to raise issues
- support workers if they witness unacceptable behaviour by customers by explaining politely but firmly that such behaviour is unacceptable
- deal with any complaints or allegations which come to their attention appropriately, effectively and confidentially, respecting the rights of all relevant parties
- ensure that complainants are not victimised or retaliated against for complaining



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**All Trust employees are required to complete the following declaration that they have read and understood the Code of Conduct, including appendices.**

### **Declaration**

I acknowledge receipt of the Trust's Code of Conduct, including the appendices which relate to Standards of Behaviour, roles and responsibilities

I have read all the documents and understand:

- the behaviour expected of me whilst I work for the Trust
- the action I should take if I become aware or suspect any breach by another worker
- that any breach by me could lead to disciplinary action being taken against me, which could result in me being dismissed from my employment.

Print name: .....

Signature: .....

Employee number: .....

Date: .....

Please return to:

School/Trust HR Office

This document will be retained on your personal file.