

Code of Conduct Policy

September

2025

Contents

1. Introduction.....	4
1.1 Aim	4
1.2 Scope and Application	4
2. Responsibilities	4
3. Principles.....	4
3.1 Accountability & Management of Staff	4
4. Standards	5
4.1 Safeguarding.....	5
4.2 Honesty, Integrity, Impartiality and Objectivity	5
4.3 Respect for Others.....	5
4.4 Definition of bullying, harassment and victimisation	6
4.5 Stewardship.....	6
4.6 Personal Interests.....	6
4.7 Registration of Interests	6
4.8 Reporting Procedures.....	6
4.9 Openness, Data protection and Confidentiality	6
4.10 Duty of Trust.....	6
5. Working with Vulnerable Clients	7
6. Disclosure of criminal convictions/childcare qualification	7
7. Contact with the public, media and other agencies.....	8
8. Dress and appearance	8
9. Outside commitments, personal interests and working for outside bodies	8
10. Working with the school's property and money	11
10.1 Use of school Equipment and Facilities	11
10.2 Use of financial resources	11
10.3 Headteachers.....	11
10.4 Overpayment to employees	12
10.5 Debt to the school or council	12
10.6 Misuse of permits.....	12
10.7 Theft from school or council	12
11. Use of internet/social networking media.....	12
12. Covert Recording	13
13. Procurement.....	13
13.1 Placement of contracts.....	13
13.2 Separation of roles during tendering	13



14.	Health and safety responsibilities.....	14
15.	Alcohol, illegal drugs and substance misuse	14
16.	Relationships with governors.....	14
17.	Bribery, gifts and hospitality	14
18.	Sponsorship	15
19.	Ownership of intellectual property/copyright.....	15
20.	Disclosure of information	15
21.	Whistleblowing	16
22.	Political neutrality	16
23.	Approval and Variation Process	18
	Appendix 1 – Zero Tolerance Statement	18
	Appendix 2 – Dignity and Respect at Work Policy Statement.....	21
	Appendix 3– Version Details	22



1. Introduction

1.1 Aim

- 1.1.1 The purpose of the Code of Conduct is to provide a set of clear standards for staff so that they know what is expected of them with regards to their conduct, attitude, and behaviour during their employment with the school. All employees will be expected to bring to the attention of their Headteacher/line manager any impropriety or breach of this or other policies (e.g., Safeguarding, Health & Safety, discrimination).
- 1.1.2 The Code is not an exhaustive list of the expected standards of behaviour, but it provides general guidance on how to ensure that your actions and behaviour are consistent with the school's ethos, staff policies and the high standard of conduct required in maintaining public confidence in the school.

1.2 Scope and Application

- 1.2.1 This Code of Conduct applies to all school employees. Contractors, consultants, agency workers or volunteers engaged with the school will also be expected to abide by the standards and principles set out in the Code. Employees should familiarise themselves with the content of this Code and any updates as soon as they are provided. It is good practice for the Headteacher to remind employees of the contents of the code of conduct on a regular (e.g., annual) basis.
- 1.2.2 It is good practice and recommended that schools have a separate code of conduct for Governors. Governors services recommend National Governance Association's, as it's freely available and updated annually: [Ethical governance | Model code of conduct for governing boards - National Governance Association \(nga.org.uk\)](https://www.nga.org.uk/governance/ethical-governance).

2. Responsibilities

- 2.1 Employees have responsibility to conduct themselves in a professional and lawful manner. The school therefore expects all employees to abide by the following core standards. Failure to adhere to the standards and to the Code of Conduct could lead to disciplinary action and depending on the severity of the breach the school may consider your dismissal.

3. Principles

3.1 Accountability & Management of Staff

- 3.1.1 All staff working on behalf of the school are expected to work diligently and to contribute positively to their daily tasks in the provision of services to the school community. You must therefore undertake your duties as outlined in your job description to the best of your ability and must comply with the terms of your contract of employment. You must comply with all legitimate instructions from your manager and with all operational procedures and regulations.
- 3.1.2 As a member of staff (permanent, fixed term contract, seconded, temporary, agency, or apprentice) or volunteer you are accountable to the school for your actions where these could have an impact on the school.



- 3.1.3 If you manage staff, you will be responsible for setting an example to employees in the application of this code. You must ensure that you familiarise yourself with all the school's employment policies and procedures and apply them in a non-discriminatory way. You will be responsible for communicating expected standards of conduct to employees, advising them of any rules which may apply.
- 3.1.4 Employees who are involved in making appointments or any decisions relating to discipline, promotion, pay or conditions of another employee or prospective employee must take these decisions fairly and impartially and declare any pecuniary interest.
- 3.1.5 The school always expects integrity and honesty from its employees and prospective employees. Supplying false information or documents or attempting to deliberately mislead for example at an interview panel, could result in disciplinary action being taken against you and may lead to dismissal.
- 3.1.6 Employees should act without favouritism and unconscious bias and should act in accordance with the Close Relationships at Work Policy.

4. Standards

4.1 Safeguarding

- 4.1.1 It is the responsibility of all employees to safeguard and promote the welfare of children and young people. Employees who work with children are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motives and intentions.

4.2 Honesty, Integrity, Impartiality and Objectivity

- 4.2.1 You must perform your duties with honesty, integrity, impartiality, and objectivity.

4.3 Respect for Others

- 4.3.1 You must treat others with respect and must not unlawfully discriminate against any person. The Equality Act 2010 prohibits all organisations from discriminating against, harassing or victimising employees and prospective employees based on their protected characteristics which are – age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race including ethnic or national origins, colour or nationality, religion or belief, sex (gender), sexual orientation. You are expected to conduct yourself in line with the above obligations.
- 4.3.2 The school is committed to the development and maintenance of a positive working environment, which fosters equality of opportunity, values diversity and is free from harassment, bullying and hate crime. The school fully supports the right of all people to be treated with dignity and respect at work and as such will not permit, condone, or tolerate bullying and/or harassment in the workplace.
- 4.3.3 Employees are expected to conduct themselves in line with the school's Zero Tolerance for Discrimination Statement (Appendix 1), which outlines the school's commitment to eliminate harassment or discrimination on the grounds the protected characteristics listed above.



- 4.3.4 Where an employee alleges bullying/harassment/victimisation, this will be investigated in accordance with the school's Disciplinary Policy & Procedure.

4.4 Definition of bullying, harassment, and victimisation

- 4.4.1 **Harassment** - is conduct of a physical, verbal, or non-verbal nature, or hostile behaviour that is unwanted, uninvited, embarrassing, threatening or personally offensive to the individual concerned.
- 4.4.2 **Bullying** - may be defined as offensive, intimidating, malicious or insulting behaviour. It can be an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient.
- 4.4.3 **Victimisation** - occurs when an employee is subjected to a detriment because they have made or intend to complain or lodge a grievance in good faith.
- 4.4.4 **Hate crime** - is any incident, which constitutes a criminal offence, which is perceived by the victim or any other person as being motivated by prejudice or hate.

4.5 Stewardship

- 4.5.1 You must use any public funds entrusted to or handled by you in a responsible and lawful manner.
- 4.5.2 You must not make personal use of school property or facilities unless authorised to do so.

4.6 Personal Interests

- 4.6.1 You must not allow your personal interests to conflict with the school's service provision.

4.7 Registration of Interests

- 4.7.1 You must comply with the school's rules in relation to registering interests and declaring gifts or hospitality received.

4.8 Reporting Procedures

- 4.8.1 You must not treat colleagues less favourably because they have or because they intend to act under any of the school's reporting procedures (for example under the Whistleblowing policy).

4.9 Openness, Data protection and Confidentiality

- 4.9.1 You must not disclose information given to you in confidence, or any information acquired of a confidential nature, without the express consent of a person authorised to give it, unless you are required to do so by law. This does not preclude you sharing information relevant to your work with colleagues, managers or governors as appropriate and safeguarding responsibilities will always be paramount.
- 4.9.2 You must not prevent anyone from gaining access to information to which they are entitled by law.
- 4.9.3 You will comply with data protection rules.
- 4.9.4 You will take particular care in relation to data protection and confidentiality when working remotely from the school.

4.10 Duty of Trust

- 4.10.1 Employees must act in accordance with the trust that the public is entitled to place in them. The school reserves the right to take action against any employee whose actions and/or



behaviour, inside or outside work could reasonably be regarded as bringing the school into disrepute.

5. Working with Vulnerable Clients

- 5.1 The school takes very seriously its responsibilities towards the disadvantaged and vulnerable members of the community, in particular children, older persons and disabled persons.
- 5.2 You are expected to take additional care in dealing with the more vulnerable members of the community and must do nothing which may:
- Damage public confidence in your motives
 - Damage public confidence in your integrity as an employee
 - Bring the school into disrepute.
- 5.3 The school has a legal obligation to carry out checks for convictions, whether spent or not, where we propose to offer an individual a position working with vulnerable persons. This obligation also extends to existing employees who are moving into such a post. Other relevant legislation can be found in the document **Keeping Children Safe in Education - Statutory guidance for schools and colleges**.
- 5.4 Employees whose employment is subject to a Disclosure and Barring Service (DBS) disclosure will be required to comply with any DBS and Pre-Employment Check policies in force. Employees must also ensure that they renew any membership of a professional body that is a specific requirement of their job. Employees will be required to allow the school access to view the DBS update online records or to renew their DBS disclosures on a three-yearly basis or 'when requested' to ensure that the school is complying with its obligation to safeguard its vulnerable client group.
- 5.5 Failure to comply with a request for DBS renewals, or any other professional membership or registration renewal, may be considered a disciplinary offence and will be dealt with under the school's Disciplinary Policy & Procedure. Where this occurs, you may also be suspended from your duties.

6. Disclosure of criminal convictions/childcare qualification

- 6.1 You are required to declare, at the earliest possible opportunity, any convictions or bind-overs received during the course of your employment, to your Headteacher/line manager. You should also declare any cautions received during the course of your employment if they relate to fraud or theft, or relate to any matter which would directly or indirectly impact on your responsibilities with regard to children, young persons or vulnerable adults, or if it is likely that the conduct for which the caution was received would bring the school into disrepute.
- 6.2 In the event that you are unsure whether to disclose a caution or not, you should contact your Headteacher/line manager in confidence to discuss the matter.
- 6.3 Failure to declare any such conviction, bind-over or relevant caution, for whatever reason, may be regarded as gross misconduct under the school's Disciplinary Rules.



- 6.4 Employees are required to notify the Headteacher immediately of anything now or in the future that affects, or might affect, their suitability to work in the school including any cautions, warnings convictions, orders or other determinations made in respect of the individual or a member of their household that would render them disqualified from working with children under the Childcare (Disqualification) Regulations 2018¹, replacement or similar legislation. Failure to notify the Headteacher may be considered as gross misconduct under the disciplinary processes and could result in summary dismissal.

7. Contact with the public, media and other agencies

- 7.1 You must not make any public statement on behalf of the School of Council or engage in communication with the media on behalf of the school in regard to any employment or service matter, without the express consent of your Headteacher. All enquiries from the press must be referred to the Headteacher, who will inform the Council's Communications Team and Schools' Human Resources.
- 5.2 Only Headteachers (or Chair of Governors in respect of the Headteacher) may provide an employment reference on behalf of the school. If you provide a personal reference for a colleague or former colleague, you must make it clear that you are doing so in a personal capacity only and should not use the school's headed paper or the school email account. Further details on providing references can be found in the Schools' Human Resources Guidance on providing references.

8. Dress and appearance

- 8.1 Your dress and appearance must be appropriate to the role that you perform and must comply with the standards set out in the school's agreed dress code in force at the time. Factors that will be taken into account in determining what is appropriate dress and appearance include:
- The requirement to wear particular clothing/ equipment for health and safety reasons
 - the nature of the role and working environment
 - whether you deal with parents and the school community regularly
 - whether you deal with other organisations or bodies where you are representing the views and interests of the school
 - accepted norms for dress/appearance within the working and operating environments of the school.

9. Outside commitments, personal interests and working for outside bodies

- 9.1 The standards of conduct as set out in this code may also extend to your life outside work.
- 9.2 Your time outside working hours is your own personal concern. You must not, however, put yourself in a position where your job and your personal interests conflict. Where the slightest doubt exists, and where there is a potential conflict of interest, you are advised to either decline acceptance of outside work or membership of an external body or organisation, or to

¹ Part 2 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Extended Entitlement (Amendment) Regulations 2018 SI 794 of 218.



seek the advice of your Headteacher before accepting any such outside work or membership of such a body.

- 9.3 It is important that you discuss your intention to undertake any other employment, or any intention to become a member of an external organisation (whether appointed as the official school or Council representative on an outside body or otherwise), with your Headteacher/line manager, particularly if you have doubts or concerns, in order that any involvement with the school or Council and any conflicts of interest can be identified and assessed. This will help to protect you should any question of conflict of interest arise subsequently.
- 9.4 Headteachers should check with their staff whether employees have existing arrangements of which they are unaware and seek to review the position in relation to membership of outside bodies and/or outside employment at least annually to ensure that a conflict of interest has not arisen where no conflict existed previously.
- 9.5 You must exercise great care and diligence when undertaking paid or voluntary work outside the school. Any paid or unpaid work undertaken should not conflict in any way with your school duties or make use of material to which you have access by virtue of your position. You must not in your official capacity allow your personal interests to conflict with the school's requirements or use your position improperly to confer an advantage or disadvantage on any person.
- 9.6 You must declare any activity, relationship or other personal interests, whether financial or non-financial, where there may be a conflict of interest between your school duties and your private interests. You are also required to declare personal or business interests which may influence your judgement or may be perceived to do so. This includes membership of organisations/outside bodies where conflicts may arise or any organisation which may seek to influence the policies of the school, for example a local campaigning group (but excluding any representative body or professional body membership). Declarations must be made in writing on the form provided by the school and will be retained on your personal file.
- 9.7 You must declare your membership of any organisation which is not open to the public without formal membership and commitment of allegiance and which has secrecy about rules, membership or conduct (for example, the Freemasons).
- 9.8 You must not do private work during your school work time or whilst you are on any authorised paid leave.
- 9.9 The school will not prevent you from undertaking additional employment (paid or unpaid) outside working hours provided it does not conflict with the law, the school's interests or in any way weaken public confidence in the school. You are required to notify the school in writing before undertaking any other employment and must declare any voluntary or unpaid work. All school employees are specifically required to obtain consent in writing from their Headteacher/line manager in advance, on each occasion, if they wish to engage in any other business or take up additional employment.
- 9.10 Many employees undertake valuable voluntary work in the community in their own time and the school supports this. However, any significant interest in an organisation must be declared, for example, acting as a member of the management committee of a charity where



the school has some involvement with the organisation. If in doubt the employee should discuss the matter with their Headteacher/line manager.

- 9.11 When carrying out any external activities you must conduct yourself at all times in a manner which is consistent with your obligations under this Code of Conduct so as to avoid bringing the school into disrepute.
- 9.12 You should avoid putting yourself in a position where your involvement in a local community group brings, or is likely to bring, the school into disrepute or could reasonably be perceived as putting you in a position where your involvement is in direct conflict with contractual obligations. In these circumstances you must consider whether it is in the best interest of the school for you to remain involved with the external organisation.
- 9.13 The school will not unreasonably require you to cease or refrain from other work/employment unless there is a conflict of interest, or there is a reasonable belief that the physical or mental demands of the other work have a damaging effect on your ability to carry out your normal duties for the school.
- 9.14 If you fail to declare any personal interests as described above you may be subject to disciplinary action being taken against you. Any employee who is in doubt as to whether or not specific outside conflicts exist and should be declared, should contact the Headteacher or schools HR for guidance.
- 9.15 Examples of circumstances where there is potential for a conflict of interest to arise include:
- A Finance Officer also working as a treasurer for a charitable organisation that submits bids to the Council for funding;
 - A school leader/manager who is also a governor of another school;
 - A school leader/manager who has financial interests in private companies providing services to schools.
- 9.16 Staff governors should withdraw from those parts of governors' meetings where a conflict of interest arises.
- 9.17 Applicants for posts should not approach or attempt to influence officers or other officials who could influence the normal recruitment process. Any such attempt will lead to disqualification from the recruitment process and/or disciplinary action.
- 9.18 Where you are working in a line management relationship with someone who is (or becomes) a relative, you must declare this to your Headteacher/line manager/Chair of Governors who will then make a decision as to the appropriate course of action.
- 9.19 For the purpose of above, 'relative' includes:
- Spouse/partner
 - Parent/parent-in-law
 - Son/step son
 - Daughter/step daughter
 - Brother/sister
 - Grandparent
 - Grandchild
 - Uncle/Aunt
 - Nephew/niece



- Child of a partner

Relatives will also include the spouse or partner of any persons named above.

10. Working with the school's property and money

10.1 Use of school Equipment and Facilities

10.1.1 You must not use school time or facilities, for example, IT equipment, telephones, vehicles or any other school property for personal use or in connection with any outside work or activity (paid or unpaid), without the written permission of the relevant Headteacher. Any telephone usage will only be permitted in very exceptional circumstances and such use must be disclosed and paid for. The misuse or unauthorised use of school property may result in disciplinary action being taken against an employee.

10.1.2 Employees must ensure that they take care of school property at all times. If employees are found to have caused damage to school property through misuse or carelessness, this may result in disciplinary action.

Please note: Employees are responsible for the safety and security of their personal property while on school premises. The school will not accept responsibility for the loss or damage of personal possessions.

10.2 Use of financial resources

10.2.1 You must ensure that you use public funds entrusted to you in a responsible and lawful manner, ensuring value for money to the local community and avoiding legal challenge to the school.

10.2.2 School staff who are budget holders and who overspend significantly without alerting the Headteacher/Chair of Governors or do not follow the financial systems and controls in place (e.g. scheme of delegation) may be subject to disciplinary action in accordance with the school's Disciplinary Policy & Procedure.

10.3 Headteachers

10.3.1 The school Financial Regulation and Scheme of Delegation sets out the Headteacher's financial responsibilities on the management of school's financial position at a strategic and operational level. This includes providing the school Governing Body with such information as they might reasonably require so that they can be satisfied that the Governing body is fulfilling its obligations in relation to financial management of the budget.

10.3.2 The Headteacher is considered to be the person with overall responsibility to the Governing Body for the financial management of the school. In this respect, the Headteacher should ensure that:

- The Governing Body is provided with financial advice;
- Proper and adequate financial systems and controls are in place;
- Statements and returns are prepared and maintained as required by the Governing Body and the LA;
- Completed financial returns are signed for submission to the LA.

10.3.3 Headteachers are responsible for managing their budgets. Where there is a risk of overspending or where financial controls have failed, it is the responsibility of the



Headteacher to bring this to the attention of the Governing Body and the LA, as soon as they become aware of it. Failure to do so may result in disciplinary action in accordance with the school's Disciplinary Policy & Procedure.

10.4 Overpayment to employees

10.4.1 If you receive an overpayment in salary, allowances or overtime it is your responsibility to notify your Headteacher/line manager as soon as possible after becoming aware of the overpayment, in order to make arrangements for repayment. The school or council reserves the right to take steps to recover any overpayment of salary and discuss repayment terms with the member of staff.

10.5 Debt to the school or council

10.5.1 The school and Council owe a duty of fiduciary care to all residents of the Borough. This means taking action against any person who has a debt to the school or Council. Employees are required to set a good example by not allowing themselves to become indebted to the school or Council. It is therefore not acceptable for employees to be in arrears on Council rent or Council Tax. Where this occurs, and there is no prior arrangement in place to clear these arrears, the employee may be subject to disciplinary action.

10.6 Misuse of permits

10.6.1 Employees who are alleged to be misusing permits e.g., Disabled Blue Badges and residents parking permits administered by Lambeth may be subject to disciplinary action.

10.7 Theft from school or council

10.7.1 Stealing from the school or Council, its clients or fellow employees will not be tolerated.

Waste, loss, fraud, unauthorised use or wilful negligent damage to school or Council property are considered as gross misconduct and may result in your dismissal from the Council.

Therefore, employees:

- Must not steal or remove without authorisation money or property from the school, its clients or colleagues
- Must carry out their duties with care, particularly when handling the school or council's money or property (including papers)
- Must not take responsibility for money or property unless it is part of their official duties
- Must not use equipment including computers, council vehicles, telephones, or money for any unauthorised purpose
- Must not copy school or council computer software for their own use
- Must not take school or council equipment home without the express permission of their Headteacher/line manager.

11. Use of internet/social networking media

11.1 Staff should never accept invitations from or extend invitations to students, including post 16, to become friends on any social networking site. Whilst it may be perfectly innocent it leaves school staff in a very vulnerable position.

11.2 Staff must not:

- Make any offensive, threatening or derogatory comments about students, colleagues, parents or the school that could be considered as bringing the school into disrepute.



- Upload or download any images of yourself onto publicly accessible websites that may impact on your professional role in school.
 - Upload or download any images of pupils onto websites without the consent of the school and the parents.
- 11.3 Accessing any material which might be regarded as inappropriate, or offensive on the grounds of the protected characteristics listed above, may lead to disciplinary action and may be regarded as gross misconduct. This will apply to use of computers in school as well as use of computers supplied by the school and used off the school premises.
- 11.4 Staff must not post information of a confidential nature pertaining to their employment, and must not post malicious, defamatory or discriminatory remarks about any individuals, on any social media platforms (including Twitter, Facebook, WhatsApp, Snapchat). Opinions about council activity can be expressed in private or in public but any social media activity must not bring the school into disrepute or breach any policy such as bullying and harassment, equal opportunities, dignity at work, internet use or social media policy.
- 11.5 There is separate policy on the use of the school's computer, e-mail and internet facilities and you should familiarise yourself with and abide by this policy at all times.

12. Covert Recording

- 12.1 Employees are not permitted to record any disciplinary hearings and or meetings, any covert recordings would be in breach of this code of conduct, requests to record a disciplinary hearing and or meeting will be considered in accordance with our obligation under the Equality Act 2010 in providing a reasonable adjustment.

13. Procurement

13.1 Placement of contracts

- 13.1.1 If you are required to buy or sell any item or service as part of your duties, you must act in accordance with the rules and regulations as set out in the school's procurement guide and with any specific instructions in use within your service area.
- 13.1.2 All relationships of a business or private nature with contractors, or potential contractors, should be made known to the appropriate manager. If you know you have any interest in any contract which the school has entered into, or proposes to enter into, you are required, by law, to declare your interest to your Headteacher/line manager immediately.
- 13.1.3 If, in the course of your work, you deal with applications to the school for employment, you must declare to your manager if you have a relationship with any applicant.

13.2 Separation of roles during tendering

- 13.2.1 Employees involved in the tendering process and dealing with contractors should be clear on the separation of client and contractor roles within the school. Senior employees who have both a client and contractor responsibility must be aware of the need for accountability and openness.



- 13.2.2 Employees must exercise fairness and impartiality when dealing with all customers, suppliers and other contractors and sub-contractors.
- 13.2.3 Confidential information on tenders or costs for internal or external contractors should not be disclosed to any unauthorised party or organisation.

14. Health and safety responsibilities

- 14.1 All employees have a responsibility, under the Health and Safety at Work Act 1974, to take care in undertaking your duties. It is your personal responsibility to wear protective clothing and use any safety equipment, which is issued to you. You must report any accident/incident that you have at work and report any health and safety risks to your Headteacher/line manager without delay.
- 14.2 If you are a manager, you also have a responsibility for the health and safety of your staff, taking all reasonable steps to ensure that all activities are carried out with due regard to the school's safety policy.

15. Alcohol, illegal drugs and substance misuse

- 15.1 Alcohol, drugs and substance misuse impairs judgement and can put you, your work colleagues and members of the public at risk. Abuse of any such substance whilst you are at work (or out of work where could impact on your work) may be treated as a disciplinary offence and will be dealt with accordingly. For further guidance please refer to any Substance Misuse Policy applicable at the school.

16. Relationships with governors

- 16.1 The Headteacher is responsible for day-to-day management of the school. The role of the Governing Body is to provide strategic direction, to oversee financial performance and to support and challenge the Headteacher and senior leaders.
- 16.2 Mutual respect and good working relationships between employees and governors is essential a successful school; however, close personal familiarity between employees and individual governors can damage this relationship. In matters related to work, professional relationships should be maintained.
- 16.3 Employees and the governing body should not undermine the legitimate line management role of the Headteacher and must not seek to involve governors in personal matters which relate to any aspect of their employment, for example, pay and grading, grievances etc. without following the correct process in the relevant school procedure.

17. Bribery, gifts and hospitality

- 17.1 You must not undertake any activity or conduct which is contrary to the requirements of the Bribery Act 2010. Where you believe or suspect that a bribe has been offered or accepted by another employee, agency worker, elected member, contractor or agent of the school you should report this.
- 17.2 You must not seek, request or accept a bribe or payment from a third party that you know or suspect is making the offer with the expectation or hope that they will obtain an advantage or a decision which they would not otherwise receive.



- 17.3 You should not accept hospitality or gifts that are offered to you by any organisation or person able to provide work, goods or services to the school. Similarly, where you are in a position to influence, you must not show favour to anyone in connection with school business.
- 17.4 You are required to report all offers of bribes, gifts or hospitality. Bribes must not be accepted. Where an offer of a gift or hospitality is accepted it should only be done so where it is consistent with the school's gifts and hospitality standard and must be recorded appropriately.
- 17.5 All employees are forbidden to ask for tips or any payment for service or goods provided. All payments for goods and services provided by the school should be secured via the school's official income procedures.
- 17.6 The employee should not be paid by any other entity for work done in the course of their employment. All payments to an employee must be approved by the school's Governing Board or in accordance with the school's scheme of delegation.

18. Sponsorship

- 18.1 Where an organisation wishes to sponsor or is seeking to sponsor a school activity whether by invitation, tender, negotiation or voluntarily, the basic guidelines concerning acceptance of gifts and hospitality apply.
- 18.2 Where the school wishes to sponsor an event or service, neither an employee nor any partner, spouse or relative must benefit from such a sponsorship. Similarly, where the school gives support in the community, through sponsorship, grant aid, financial or other means, employees should ensure that impartial advice is given and that no conflict of interests exists.

19. Ownership of intellectual property/copyright

- 19.1 You should make yourself aware of the rules on the ownership of intellectual property or copyright created during your employment. "Intellectual Property" is a wide term which includes inventions, creative writings and drawings. As a general rule, any Intellectual Property created by you during the course of your employment with the school in line with your duties belongs to the school and as such must not be used by you in relation to any work performed outside the school, including work undertaken after the conclusion of your employment, without the express consent of the school.

20. Disclosure of information

- 20.1 The law requires that certain types of information must be made available to Council Members, auditors, government departments, service users and the public. The Freedom of Information Act 2000, for example, requires disclosure of certain information in response to written requests, whilst the Data Protection Act 2018 requires that the school and Council complies with statute in relation to the handling and processing of personal data. If you are in doubt guidance should be sought from your line manager before disclosing information.



21. Whistleblowing

- 21.1 Schools have a duty to ensure that there is no malpractice in the operation or delivery of services.
- 21.2 The Whistleblowing procedure covers any significant concerns that a school worker may have about malpractice in any aspect of service provision or the conduct of staff, Governors, Volunteers, Contractors or agents of the Council which is in the public interest. This means it must affect others, e.g., the general public.
- 21.3 The Whistleblowing procedure is not an alternative process for raising concerns or grievances over managerial decisions or other matters for which there are appropriate existing procedures within the school unless your particular case is in the public interest.

22. Political neutrality

- 22.1 Employees are required to serve the whole Council and its Members, not just Members of any party group. Employees must ensure that the individual rights of all Members are respected.
- 22.2 Employees, who are required as part of their duties to provide advice to Members or other employees, must do so impartially and must not allow their own personal or political opinions to interfere with their work.
- 22.3 Under Section 2 of the Local Government and Housing Act 1989 ("the 1989 Act"), the following employees are regarded as holding politically restricted posts:
- "Specified" posts, being:
 - Chief Executive
 - Chief Officer
 - Deputy Chief Officer
 - Monitoring Officer
 - Political Assistant
 - Officers exercising delegated powers
 - and
 - "Sensitive" posts² which meet one or both of the following duties- related criteria:
 - giving advice on a regular basis to the authority itself, to the Cabinet or to any committee or sub-committee of the authority or Cabinet or to any joint committee on which the authority are represented or to any Executive member
 - speaking on behalf of the authority on a regular basis to journalists or broadcasters
- 22.4 Employees holding politically restricted posts are disqualified from membership of any local authority, other than a parish or community council, from being an MP or MEP

² By S 2(10) of Local Government and Housing Act 1989 headteachers and teachers are excluded from provisions relating to politically exempt posts, but the provisions could be relevant to school based employees – for example if seconded to a senior post in the Council.

and are subject to prescribed restrictions on their political activity. You will be advised on appointment whether your post is politically restricted.

22.5 If your post is politically restricted you:

- Should not publicly voice support for a political party
- May not campaign for a political party
- May not hold political office
- May not occupy party political posts and
- May not hold particular sensitive or high-profile unpaid roles in a political party.

22.6 A Political Assistant (as defined under the 1989 Act) must not speak to the public in a way that could be perceived as speaking as an authorised representative of a political party nor must they write or publish any written or artistic work that could be perceived in the same way.

22.7 Any employee who is a member of a local authority will be permitted paid time off during working hours to perform duties as an elected member. Requests must be made through the employee's Headteacher/line manager.

22.8 Employees, whether or not they are politically restricted, must in the course of their employment follow every lawful expressed policy of the school and must not allow their own personal or political opinions to interfere with their work.



23. Approval and Variation Process

23.1 Where the School/Council wishes to amend this policy, it will consult with the relevant trade unions with a view to reaching agreement over the proposed amendment(s). This policy may be amended by agreement with the relevant trade unions at any time. Where agreement has not been reached with the relevant trade unions arising from consultations, the School/Council reserves the right to implement its proposed amendment(s) by giving one month's notice to employees of its proposal(s).

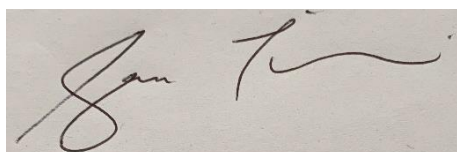
This Policy is approved and signed by:



Director, Education & Learning

Name: Abrilli Phillip

Date: April 2022



On behalf of Trade Unions: Sara Tomlinson Lambeth Trade Union's Joint Education Secretary

Name: Sara Tomlinson

Date: April 2022

Chair of Governors of School or Federation

Name:

Date:



Appendix 1 – Zero Tolerance Statement

Zero Tolerance Statement

The Council and School will not tolerate harassment or discrimination on the grounds of these protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race including ethnic or national origins, colour or nationality, religion or belief, sex (gender), or sexual orientation.

We value our customers and employees and their rights. We are fully committed to meeting:

- Our statutory duties under the Equalities Act 2010 to promote good race relations and eliminate unlawful racial discrimination
- Our legal responsibilities under other anti-discrimination legislation.

As a Council and School we are determined to:

- Promote equality of opportunity for citizens and employees
- Tackle discrimination on any grounds.

The people we serve, the people who work for us, the groups we fund and those who support them have an absolute right to raise issues of discrimination and harassment where they believe this has taken place.

- We will treat allegations of discrimination or harassment against the Council/School seriously.
- We will respect a complainant's right to confidentiality.
- We recognise that people who make allegations may be distressed, and we will give them the strongest possible support.
- We will investigate all allegations properly, quickly, fairly and with sensitivity.
- We will take action, including legal action if necessary, when discrimination or harassment is proven.
- We will take appropriate action if Council officers/School employees fail to comply with the commitments set out in this statement.

Complaints by Parents, Guardians, Public etc.

If you feel you are facing discrimination or harassment in the way the Council/School provides services, you can complain.

The School has a complaints procedure. Full details can be found on the School's website or in the School office.

Alternatively you can complain to Lambeth Council by completing the [online complaints form](#).

If you are still unhappy after using our complaints process, you may be able to complain to the Local Government Ombudsman who can be contacted here <http://www.lgo.org.uk/>

If you belong to a user group you can ask your group representative for help and support. The Council and School recognise the positive role that user groups play in raising issues of discrimination and in helping to resolve them.



Complaints by Members of Staff

If you work at the School and feel you are facing discrimination or harassment at work, you can take formal or informal action.

It may be possible to resolve the situation informally by talking directly to the person who is behaving inappropriately. You may wish to involve your line manager or an officer from Human Resources.

If you wish to pursue a formal complaint you should use the School's grievance process. If you are a trade union member you can ask your trade union or group representative for help and support. The Council and School recognise the positive role that unions play in raising issues of discrimination and in helping to resolve them.

Violence or Aggression

The Council and School have zero-tolerance relating to threats or violence to our staff. Acts of violence against members of staff are rare but such attacks, or the use of threatening or aggressive behaviour, are regarded by the Council/School as being extremely serious. The Council/School will provide full support to any employee who is the victim of violence and/or threatening or aggressive behaviour at work. The support given will be appropriate to the individual circumstances of each incident; this could include a range of measures such as banning the perpetrator from Council/School buildings or referring individual cases to Legal Services to pursue injunctions or prosecutions. If an affected employee requests counselling support, this will be made available.

All incidents will be recorded in accordance with the relevant accident reporting procedures, and the Council/School will liaise with a workplace Health and Safety representative or a TU Safety Officer as appropriate regarding any incidents.

Racial Incidents

The Council/School define a racial incident as any incident, either criminal or non-criminal, which is perceived to be racist by the victim or any other person. Racial incidents include racially-motivated verbal or physical abuse and racist graffiti. Racial harassment takes place when there has been more than one racial incident.

Individuals who want to report a racial incident should use the complaints procedure or grievance procedure as appropriate (see above).

The Council and School will seek to provide the fullest possible support to staff who are subject to racial abuse or harassment.

Incidents will be investigated if the victim asks for action to be taken.

Whistleblowing

The School's whistleblowing policy is available from the School office, this gives citizens and employees the opportunity to have concerns about discrimination and harassment heard and investigated in the strictest confidence and without fear of reprisal.

You can email your concerns to raiseaconcern@lambeth.gov.uk, or you can email complaints@lambeth.gov.uk. You do not have to give your name if you prefer not to.



Appendix 2 – Dignity and Respect at Work Policy Statement

Dignity and Respect at Work Policy Statement

The Council and School are fully committed to providing employees with a working environment that is free from all forms of harassment, bullying, victimisation and any other form of hate crime.

The Council and School will not tolerate harassment or discrimination on the grounds of the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race including ethnic or national origins, colour or nationality, religion or belief, sex (gender), and sexual orientation.

Harassment is conduct of a physical, verbal or non-verbal nature, or hostile behaviour that is unwanted, uninvited, embarrassing, threatening or personally offensive to the individual concerned.

Bullying may be defined as offensive, intimidating, malicious or insulting behaviour. It can be an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient.

Victimisation occurs when an employee is subjected to a detriment because they have made or intend to complain or lodge a grievance in good faith.

Hate crime is any incident, which constitutes a criminal offence, which is perceived by the victim or any other person as being motivated by prejudice or hate.

The Council and School are committed to the development and maintenance of a positive working environment, which fosters equality of opportunity, values diversity and is free from harassment, bullying and hate crime. The Council and School fully support the right of all people to be treated with dignity and respect at work and as such will not permit, condone or tolerate bullying and/or harassment in the workplace.

The school will make all employees and those working on behalf of the school aware of the standards of behaviour and conduct expected as set out in the **School's Disciplinary Policy and Procedure** and **Code of Conduct**. Appropriate disciplinary action may be taken against any employee who violates this policy.

The School therefore commits to take steps to:

- Ensure that employees are aware of the types of behaviour which may constitute bullying and harassment and their responsibilities in preventing such behaviour;
- Ensure that all employees are aware of their personal and legal responsibilities for their own behaviour; and
- Promote a climate in which staff are fully supported and feel confident in bringing forward complaints of bullying and harassment.

Where an employee alleges bullying/harassment/victimisation, this will be investigated in accordance with the School's Disciplinary Policy and Procedure and / or the School's Grievance Procedure.



Appendix 3– Version Details.

	Version date: April 2022
Section	New sentences added relating to publication on social media.
Section 9	Clarified that declarations of interest should be made in writing and form retained on personal file.
Section 12	New Section on covert recording
Section 15	Substance abuse – added a note to say that abuse out of work may be relevant also
Section 17	Bribery section – added final paragraph regarding approval of payments for work.
Section 22	Footnote added to clarify that teachers and Headteachers are not caught by the political restriction requirements.
Appendix 1	Complaints section – separated sections for public from section for staff.
Appendix 3	Added a version history section.
	Formatting. Minor amendments.

Date of agreement with trade unions: April 2022

Scheduled review date: 3 years from agreement with trade unions.

