



**The TRUE Learning
Partnership**

Employee Code of Conduct

Approved by the Trust Board in July 2021

CONTENTS

Details	Page Number
Information about the Trust	3
Scope, Aims and Principles	4
Legislation and Guidance	4
Compliance	4
Summary	5
Setting an Example	5
Safeguarding Pupils/Students	6
Employee and pupil/student relationships	7
Pupil/Student Development	7
Recruitment	7
Honesty and Integrity	8
Working Relationships	8
Personal Relationships	8
Conduct outside work	9
External activities or employment	9
Gifts, Hospitality or sponsorship	9
Tendering and Contracting	11
Use of School/Trust Identity, Property and Facilities	11
GDPR/ Confidentiality/ Disclosure of information	12
Media Relations	14
Equality	14
Monitoring and review	14

THE TRUE LEARNING PARTNERSHIP

The TRUE Learning Partnership is a cross phase Multi Academy Trust established in December 2018 and is currently comprised of five academy schools. Originally founded by both Poynton High School and Lostock Hall Primary School in December 2018, the Trust now encompasses Disley Primary School, Glossopdale High School and Hague Bar Primary School.

All five schools in the Trust are closely located to one another which lends itself to many opportunities to work closely and collaboratively. Our vision is a community based, values focused, learning organisation that meets the needs of all its members so that all will achieve. By working within our community clusters, we will ensure that every child that is presented to us at the age of 3 is the best they possibly can be by the time they leave us at 18.

We are exceptionally proud of our employees and the dedication they display every day to support our students to reach their potential. Whether a member of our Leadership Team, Teaching or Support Teams – all have a vital role to play in providing an environment where we can provide world class education where all can achieve.



SCOPE

This code of conduct is for all employees of The TRUE Learning Partnership (the “Trust”).

AIMS

The aim of this document is to give clear guidance to all employees to ensure that they are fully aware of the standards of conduct and behaviour required of them both inside work and, where applicable, in their personal life and the procedures which may be applied where there are concerns.

PRINCIPLES

This document is not exhaustive. The responsibility for complying with this code lies with all Trust employees, who are encouraged to seek advice if they are in any doubt about the interpretation or impact of any aspect of the code.

All employees have a responsibility to act and to take decisions based on public interest and should act with honesty, integrity, objectivity and impartiality at all times. They must always act in accordance with the trust that the wider community and everyone within it is entitled to place on them and be open about, and take accountability for, their actions and decisions.

Employees should always remember their responsibilities to the community that they serve and ensure courteous and efficient service delivery at all times. A core principle of these responsibilities is that everyone has a right to be treated with fairness and equity and all employees must ensure that they always comply with the school and Trust policies, and the law, relating to equality and discrimination.

All employees must be committed to promoting the safety, welfare and interests of students as paramount.

Employees also need to take care that their behaviour outside the workplace does not conflict with their work responsibilities and will not bring the school/Trust into disrepute

LEGISLATION AND GUIDANCE

In line with the statutory safeguarding guidance “Keeping Children Safe in Education”, we have developed this Trust Code of Conduct, which covers acceptable use of technology, employee/student relationships and communications, including the use of social media. This document also complies with our Funding Agreement and Articles of Association.

COMPLIANCE

It is vital that all employees are exemplary in their conduct at work and non-compliance with the principles laid out in this document will be dealt with in accordance with The TRUE Learning Partnership’s Disciplinary Policy and Procedure. Please access the following link: [TTLP Disciplinary Policy and Procedure](#)

Employees who believe that other employees may be breaching this Code of Conduct have a duty to report this, in confidence, to the Head Teacher and/or the Chief Executive Officer who will investigate the situation and, where necessary, take appropriate action. If the concerns relate to these employees then reports should be directed to the Clerk to the Trust Board. Employees who report a potential breach of the code will not be penalised or discriminated against for having done so. Please access the following link: [TTLP Whistleblowing Policy](#)

SUMMARY

This document details the standards of conduct that the Trust requires all employees to follow in a range of areas and circumstances, as listed below:

- Setting an Example
- Safeguarding Pupils/Students
- Pupil/Student Development
- Recruitment
- Working Relationships
- Personal Relationships
- Gifts, Hospitality and Sponsorship
- Tendering and Contracts
- Use of Academy/Trust Identity, Facilities and External Activities
- Confidential/Disclosure of Information

Where appropriate, this document should be read in conjunction with other relevant school and Trust policies and guidance.

This document is not intended to cover day to day work conduct, performance or attendance issues which are covered by the relevant employment policies. Details of these policies can be found at individual school level and at Trust level for central services employees.

SETTING AN EXAMPLE

All employees who work for The TRUE Learning Partnership set examples of behaviour and conduct which can be copied by pupils/students. All employees must, therefore, demonstrate the highest standards of conduct in order to encourage our pupils/students to do the same. All employees must therefore avoid using inappropriate or offensive language at all times.

All employees must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct and maintain professional boundaries at all times.

All employees must follow guidance in line with safer working practices and the Health and Safety at work legislation. This guidance is provided as part of induction processes and through formalised online training.

SAFEGUARDING PUPILS/STUDENTS

All employees have a duty to safeguard pupils/students from:

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- specific safeguarding issues as outlined in DfE guidance, Keeping Children Safe in Education

The duty to safeguard pupils/students includes the duty to report concerns about a pupil/student to the individual school or Trust Designated Safeguarding Lead (DSL) for Child Protection. The Trust Designated Safeguarding Lead is Miss Catherine Holyland.

Employees are provided with copies of the individual school's Safeguarding Policies and all employees must be familiar with these documents. Copies of these are available from each school website. Central services employees should follow policies and procedures defined in their base school location. The TRUE Learning Partnership has produced a Safeguarding Statement aligned to the individual school policies. Please access the following link: [The TTLP Safeguarding Statement](#).

Employees must not demean or undermine pupils/students, their parents or carers, or colleagues. They must take the utmost care of pupils/students under their supervision with the aim of ensuring their safety and welfare.

Employees have a duty to report any safeguarding concerns relating to a colleague behaving in a way that may cause harm to a child to the Designated Safeguarding Lead at school or Trust level. This would include developing an inappropriate relationship with a child outside the school/Trust environment. All employees reporting concerns, as well as those whom the concerns are about, will receive the necessary support.

Employees and pupils/students using digital cameras, video or sound recorders must ensure that they inform and ask permission of others before recording and always use equipment in a respectful manner. Any photographs or videos must be taken using school/Trust equipment. All images relating to pupils/students or school must immediately be transferred to the designated network drive in school for security and to adhere to personal guidelines. Employees must verify photograph permissions held for individual students held in MIS systems. Only photographs or videos deemed essential for a defined activity must be taken and they should be safely disposed of once they are no longer required for that purpose.

Employees should not use their mobile phones in work during their contact time with pupils/students. Mobile phones should only be used in areas of the school where pupils/students are not present.

EMPLOYEE AND PUPIL/STUDENT RELATIONSHIPS

Employees must observe proper boundaries with pupils/students that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If employees and pupils/students must spend time on a one to one basis employees must ensure that:

- This takes place in a public place that others can access
- Others can see into the room
- A colleague or line manager knows this is taking place

Employees should avoid contact with pupils/students outside of school hours if possible.

Personal contact details should not be exchanged between employees and pupils/students. This includes social media profiles.

If an employee is concerned at any point that an interaction between themselves and a pupil/student could be misinterpreted, this should be reported to their line manager, Head Teacher or CEO as appropriate.

PUPIL/STUDENT DEVELOPMENT

Employees must comply with Trust policies and procedures that support the wellbeing and development of pupils/students.

Employees must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of pupils/students.

Employees must follow reasonable instructions that support the development of pupils/students.

RECRUITMENT

Employees who are involved in recruitment and selection processes should follow The TRUE Learning Partnership policy on recruitment and selection and should ensure that all appointments are made on merit. It is unlawful for an appointment which is based on anything other than the ability of the candidate to do the job required.

Recruitment and selection processes place a wide range of employees in a position where they may be able to influence decisions. Employees involved in the process must be specifically trained to ensure that candidates are selected on their ability to do the job required. Every interview panel must be led by an employee who has completed accredited safer recruitment training.

Employees must not be involved in any appointment where they are related to, or have a close personal relationship with, any of the applicants. This also includes providing a reference.

HONESTY AND INTEGRITY

All employees must maintain high standards of honesty and integrity in their role. This includes, but is not limited to, when dealing with pupils/students, handling money, claiming expenses and using school property and facilities.

WORKING RELATIONSHIPS

All employees are expected to maintain professional working relationships with all individuals and groups of individuals that they have dealings with in the course of their work. They should always dress in a manner which is appropriate and relevant to their job role and working environment and behave in a professional manner at all times, and should not allow work and personal interests to conflict.

PERSONAL RELATIONSHIPS

It is acknowledged that employees who work together may form close personal friendships and, in some cases, romantic relationships. Whilst The TRUE Learning Partnership would not wish to interfere with such friendships and relationships, there would be cause for concern, and/or action to be taken, if potential or actual difficulties and problems at work were to arise from such relationships. Similar concerns could also arise where family members work closely together.

All employees have an obligation to The TRUE Learning Partnership not to compromise standards of behaviour, conduct or performance through personal or family relationships. They are expected to act responsibly and to ensure that such relationships do not influence or prejudice the conduct of Trust business, bring The TRUE Learning Partnership into disrepute, or cause offence and embarrassment to other colleagues. Additionally, employees must never be involved in recruitment, disciplinary action or other employment matters relating to someone with whom they have a personal or family relationship. Employees should expressly declare any potential conflicts of interest where this arises.

Where employees feel that a personal or family relationship at work may lead to problems or conflict they should discuss this with the Head Teacher (or Chair of Governors in the case of a Head Teacher or Chair of the Trust in the case of the CEO) so that any potential difficulties can be resolved. Similarly, where a Head Teacher (or Chair of Governors in the case of a Head Teacher or Chair of the Trust in the case of the CEO) has cause for concern about relationships within The TRUE Learning Partnership, they should discuss this with the employee concerned to seek to resolve any issues that might occur. Where it is felt that a relationship at work is causing, or is likely to cause difficulties, external HR advice should be sought.

Applicants for posts within The TRUE Learning Partnership are asked to disclose any personal or family relationships with existing employees or members of the Governing/Trust Board so that it can be discussed with them during the selection process. Failure to do so could disqualify the applicant. Unless there are exceptional circumstances, such relationships should not generally affect the decision to appoint or not appoint the applicant but will allow for appropriate arrangements to be made, where necessary, to reduce the possibility of problems arising from the relationship.

CONDUCT OUTSIDE WORK

All employees should ensure the way they conduct themselves outside of work does not impact on the reputation of The TRUE Learning Partnership. In addition, if an employee were to receive a conviction, caution or childcare protection order then it must be communicated to the Head Teacher or CEO immediately (or Chair of the Trust in the case of the CEO).

EXTERNAL ACTIVITIES OR EMPLOYMENT

It is recognised that employees may wish to undertake various activities outside work. However, they should not take on any type of external private work or activity which conflicts with The TRUE Learning Partnership's interests or which prevents them from doing their normal job properly or from fulfilling the terms of their contract of employment. They must also ensure that they understand and can comply with both Working Time and Health and Safety Regulations before undertaking external private work or activities.

All employees are required to complete an annual declaration of interest return, even if this is to confirm that they have nothing to declare, and to then report issues as and when they occur.

On this basis employees must not:

- i) Undertake private work or activities during their normal working hours
- ii) Use Trust premises, property or facilities for private work or activities.
- iii) Undertake any private work which prevents them from carrying out the full range of their normal duties, including contractual overtime.
- iv) Undertake any private work or activities which could involve or bring about a conflict of interest with their normal job.

GIFTS, HOSPITALITY AND SPONSORSHIP

All employees need to be aware that it is a serious criminal offence to corruptly receive any gift, hospitality, sponsorship or other reward or advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity. If an allegation is made, it will be up to the employee to demonstrate that they have followed the guidance in this document and that any such rewards have not been corruptly obtained.

Gifts

Employees should not accept significant personal gifts from people or organisations, e.g. contractors or suppliers, who are or may be dealing with the school/Trust as to do so could render The TRUE Learning Partnership and the employee open to criticism or, in serious cases, to criminal charges of corruption.

Any gift other than those of a nominal value (up to £50) should be reported for entry into the Register of Gifts and Hospitality. Token gifts given to employees by students as a form of thanks are acceptable provided these are not excessive or inappropriate.

Where an employee is offered a personal gift that could be regarded as significant, they should politely decline the gift and use the appropriate Declaration Form to report the circumstances to the Head Teacher (or Chair of Governors in the case of a Head Teacher or Chair of the Trust in the case of the CEO).

Hospitality

All employees should think very carefully before accepting any offer of hospitality and must take the following points into account:

- i) whether the scale of the hospitality is appropriate to the circumstances. For example, the offer of light refreshments or a sandwich lunch at a meeting will generally be acceptable whilst an invitation to an expensive restaurant for a three-course meal is unlikely to be acceptable.
- ii) whether the invitation related to their role or extended in a personal capacity.
- iii) if corporate, whether attendance at the meeting or event where the hospitality is offered genuinely falls within the employee's job role and has been agreed by the Head Teacher.
- iv) whether acceptance of the hospitality could result in suggestions of improper influence.

Where, having considered the above points, an employee is concerned about hospitality being offered to them, they should use the appropriate Declaration Form to seek authorisation from the Head Teacher (or Chair of Governors in the case of a Head Teacher or Chair of the Trust in the case of the CEO).

Sponsorship

If an outside organisation wishes to sponsor an activity, whether by invitation, tender, negotiation or voluntarily, the rules detailed above about accepting gifts and hospitality will apply. Information is also available in the TTLP Donations Policy and from the CEO or CFO.

If The TRUE Learning Partnership chooses to sponsor an event or service, no employee or anyone connected with them may benefit from the sponsorship. Similarly, if The TRUE Learning Partnership wishes to give financial support in the community, any employees who

are involved in the community activity or project should ensure that any information they provide in relation to this is impartial and that they do not have any conflict of interests. Where applicable the employee will be required to complete a Declaration and Reporting Form.

TENDERING AND CONTRACTING

All orders and contracts must be awarded on merit, by fair competition between tenders. No special favours should be shown to current or former employees or to relatives, associates or friends, when contracts are being approved and subsequently awarded. Where an employee feels that there may be a conflict of interest in the work they are doing because of some link or relationship with potential or actual tenderers, they should declare this on the Declaration and Reporting Form.

USE OF SCHOOL/TRUST IDENTITY, PROPERTY AND FACILITIES

Use of School/Trust Identity

Where employees are using social networking/external internet sites in their personal life, they must ensure that they comply with the Trust's Social Media Policy, taking care to maintain the reputation and confidentiality of The TRUE Learning Partnership at all times. Any communications that employees make in a personal capacity must not bring the Trust into disrepute. Employees are not allowed to access social media websites for their personal use from the school's or Trust's computers or devices at any time. This includes laptop, palm-top, hand held computers or mobile phones distributed by the school/Trust for work purposes.

School/ Trust emails are not a private means of communication but a record on behalf of the school/Trust of work-related matters. Emails may need to be disclosed under Data Protection Laws (GDPR) and more generally (e.g. Freedom of Information requests) so it is very important to always consider the content of any email that is sent. The Trust retains the right to monitor emails and internet use on the Trust IT systems.

Letter-headed paper must only be used for official correspondence and employees must never use this type of paper for personal correspondence.

Employees who are asked to give a personal reference for a work colleague must make it clear that the reference is being given on a personal basis and that the opinions expressed are not necessarily those of The TRUE Learning Partnership. As above, letter-headed paper must not be used in these circumstances.

Use of School/Trust Property and Facilities

All employees are responsible for the safe keeping and proper care of any school/Trust property or equipment that they use in the course of their work. Any deliberate or negligent failure to take proper care will be viewed as misconduct and will lead to disciplinary action.

When accessing the internet on school/Trust equipment all websites must be appropriate, email and internet use will be monitored when it is necessary and appropriate to do so.

At work employees will have access to a range of property and facilities including office equipment, computers, stores, transport and other machinery. These are provided to support our employees in carrying out their work and should not generally be used for personal purposes.

However, some light personal use is permitted by The TRUE Learning Partnership in the following circumstances:

- Fax machines and photocopiers – if necessary, personal fax messages may be dispatched to locations within United Kingdom. Photocopies of personal documents (up to a maximum of 5 copies at one time) may be taken with line manager agreement.
- Computer Internet access and e-mails - employees are expected to adhere to the guidance given in the Trust's ICT Acceptable Use Policy which allows some light personal use of internet and e-mail facilities, subject to certain conditions.

All employees need to be aware that it is against The TRUE Learning Partnership's policy to forward or respond to chain e-mails. Chain emails are those that, in the body or subject of the message, asks the recipient to forward the email on to multiple people.

Intellectual Property

This is property which enjoys legal protection and is a result of intellectual effort including patents, copyright, trademark designs and software. Where developed in the course of school duties such intellectual property is the property of the Trust. Employees should not make use of the Trust's intellectual property to conduct private work.

If an employee wishes to publish books, articles or letters written in connection with their duties, they must first consult the Head Teacher or CEO (or Chair of Governors in the case of a Head Teacher or Chair of the Trust in the case of the CEO) who will take legal advice.

GDPR/CONFIDENTIALITY/DISCLOSURE OF INFORMATION

GDPR, the General Data Protection Regulation came into force in 2018 and gives individuals greater control of their personal data that is held by third parties. Sitting alongside GDPR is the Data Protection Act 2018 (DPA) that is also designed to strengthen and unify the safety and security of all data held within an organisation. Employers have always had a

responsibility for data under the Data Protections Act but GDPR enhanced some of this responsibility.

The key changes under GDPR include:

- Greater focus on accountability – schools must be able to demonstrate compliance
- Compulsory to have a Data Protection Officer (DPO)
- Mandatory to report data breaches within 72 hours
- 3rd party data processors must be GDPR compliant; it will be a criminal offence to work with suppliers that do not comply.

The TRUE Learning Partnership handles a large amount of personal data including information on pupils/students, such as grades, medical information, images and much more. It also holds data on employees, trustees, governors, volunteers, and job applicants.

The Trust also holds what the GDPR refers to as special category data, which is subject to tighter controls. This could be details on race, ethnic origin, religion biometric data, trade union membership and health information.

If an employee intends to use a system or engage with someone outside of school and they need data from the Trust to provide their service, it is essential that they contact the DPO to discuss this and to check that the system is compliant and appropriate to use.

Breach reporting

It is crucial that if an employee discovers a data breach or a possible data breach that this is reported immediately to the DPO, and if that is not possible then they should inform either the Head Teacher or the Director of ICT and Network Operations. As soon as a breach is discovered the Trust has just 72 hours to fully investigate and report to the Information Commissioners Office (ICO) including weekends, evenings, and nights.

Examples of breaches might be: -

- Discovering personal or sensitive information has been sent to the wrong person.
- Lost data, either in paper form or electronic which may contain personal or sensitive information within it e.g. students' names, addresses, DOB, medical information, phone numbers of parents /carers.

A few key do's and don'ts

- Do tell the DPO if you spot some personal or sensitive information that is available for anyone to see in a public place – report it so it can be checked – it could be a breach.
- Do always stop and think before anything is put into a bin – is it confidential, is it personal or sensitive information, any documents of this nature should be put it in the red bin in school or shredded.

- Do think before data is taken offsite for any reason, how will it be kept safe and secure – is it right to take it offsite – always ask if you are not sure.
- Don't use unencrypted devices or pen drives for school purposes.
- Don't leave data unattended. Lock PC screens and keep data in secure places in work areas.
- Don't just press print, use the print lock facility if printing personal or sensitive information.

Safeguarding

Provisions are made in the DPA 2018 around the safeguarding of children and individuals at risk. This allows the sharing of information without consent in certain circumstances under safeguarding. If an employee finds themselves in such a situation they should always refer to the Designated Safeguarding Lead for advice.

MEDIA RELATIONS

Employees should not communicate externally or disclose any information to the press or other media about The TRUE Learning Partnership, which is not already in the public domain.

If an employee receives an enquiry from the media they should not make any initial comment or response and must immediately direct the enquiry to the CEO who will either respond to the enquiry or work with the employee to ensure that the information given out is accurate and timely.

Any unauthorised comment made to the media on behalf of The TRUE Learning Partnership that is potentially harmful to its reputation may result in disciplinary action.

EQUALITY

The TRUE Learning Partnership will ensure that, when implementing this Code of Conduct, no employee will be disadvantaged on the basis of their gender or transgender, marital status or civil partnership, racial group, religion or belief, sexual orientation, age, disability, pregnancy or maternity. This means that the code may need to be adjusted to cater for the specific needs of an individual including the provision of information in alternative formats where necessary.

MONITORING

Data relating to this Code of Conduct will be collated and monitored regularly by the Trust Board to ensure that it is operating fairly, consistently and effectively. Issues that are identified from the data will be dealt with appropriately.

REVIEW

The document will be reviewed in the light of operating experience and/or changes in legislation and in accordance with Trust policy in relation to policy reviews generally.