



THE DE CURCI TRUST CODE OF CONDUCT FOR EMPLOYEES

Approved by the Board of Trustees: 4th December 2023

Signature of the Chair of the Board of Trustees: 

Review date: Autumn Term 2026

1. INTRODUCTION

This code of conduct applies to all employees in the Trust and its schools (academies) whether they are permanent, temporary or casual. Individual schools will also have procedures, guidance and staff handbooks relevant to their specific setting, for example the school's Safeguarding Policy. The Teachers' Standards set out clear expectations for all teaching staff which are also expectations of the Trust; those standards pertaining to personal and professional conduct apply to all employees.

2. GENERAL PRINCIPLES

2.1. The Trust and its schools expect the highest standards of conduct from all their employees.

This code sets out the minimum standards of behaviour which employees will need to observe. It is intended to help you understand your responsibilities and be clear about what is acceptable conduct and what is not.

2.1 It is important that you are aware of and understand the Disciplinary policy, Capability policy, Dignity at Work policy, Grievance policy, Substance Misuse policy, Whistleblowing reporting procedure, the Gifts and Hospitality policy, Equal Opportunities policy and the Internet/Electronic Media policy in connection with this code. These policies are available via each school office (and the Trust's iAM Compliant system).

- 2.2 If you are unsure what is expected of you, you must raise the matter with the Headteacher or appropriate senior line-manager (or Chair of Governors in the case of the Headteacher; Chair of Trustees in the case of the CEO or CFOO).
- 2.3 If you consider you need to declare anything for the record, then do not wait until the end of the year, for your performance management / appraisal, or for the Headteacher to ask you to do so – declare it immediately by speaking to the Headteacher (or appropriate senior line-manager).
- 2.4 Any breach of this code may lead to disciplinary action and may in some instances constitute gross misconduct. The Trust and its schools reserve the right to take legal action against employees where breaches of this code are deemed to warrant such action.
- 2.5 The Trust expects all employees to deal with one another, the public, pupils and parents in a courteous and civil manner. Relationships between work colleagues should be supportive, cooperative and respectful. Employees should behave in a way that enhances the performance and well-being of others and the effectiveness of the Trust and its schools.
- 2.6 Employees should be aware of all relevant Health and Safety policies and procedures when exercising their functions.

3 GENERAL CONDUCT

- 3.1 You are expected to conduct yourself in a manner both inside and outside work, which upholds the reputation of the Trust and its schools. Misconduct at work will be dealt with in accordance with the disciplinary policy. Conduct outside of work may also result in disciplinary action if it directly affects the performance of your work or the reputation of the Trust and/or its schools.
- 3.2 You must notify the Headteacher (or CEO) if you are in any doubt about the effect of your conduct outside work.
- 3.3 If you are subject to criminal proceedings, you must disclose this immediately to the Headteacher or CEO.

4 STATUTORY REQUIREMENTS, EQUALITY AND SCHOOL POLICIES

- 4.1 As an employee, you must ensure that you know the statutory requirements of your job, and that you work within these at all times. You must also comply with all the policies and procedures at the Trust/school.
- 4.2 The Trust is committed to equal opportunities and pupil care. You are expected to act in a manner which reflects the Trust's/school's policies and values by treating all pupils, parents and colleagues courteously and with dignity at all times.
- 4.3 The Trust will not tolerate discriminatory behaviour, including bullying or harassment, which will be dealt with in accordance with the disciplinary procedure, and may be subject to criminal proceedings.

5 DUTY TO DECLARE INTERESTS

- 5.1 You must declare to the Headteacher (or CEO) any financial, personal or social interests that could conflict with the Trust's/school's interests or cause your conduct to be questioned. The interest may be advantageous or have a detrimental effect on you (an example of a detrimental interest may be a situation where you experience threats or pressure from family or friends to act in a particular way in your official capacity).
- 5.2 Employees should not have managerial responsibility for those with whom they have close private relationships (e.g. partners and family). If such relationship arises during the course of your employment, it must be declared to your Headteacher (or CEO).

6 POLITICAL NEUTRALITY

6.1 Responsibility

You have a responsibility to ensure that your own personal or political opinions do not interfere with any of the Trust/school policies or your work.

6.2 Politically restricted posts

Certain posts are politically restricted under the Local Government and Housing Act 1989. This means the post-holders are prohibited from involvement in political activities as these could conflict with the responsibilities at work. Headteachers and teachers are exempt from political restriction whatever their role or remuneration level. If your post is politically restricted, you

should have been notified separately with details of the restrictions that apply. Further information can be obtained from the Human Resources Team.

7 APPOINTMENTS AND RELATED EMPLOYMENT MATTERS

7.1 The Trust and its schools recruit on merit and requires that appointments are made without bias. If you are responsible for appointing employees, please follow the Trust's's safer-recruitment policy. In order to avoid any possible accusation of bias, you should not be involved in an appointment where you are related to an applicant, or have a close personal relationship outside work. You must not canvas on behalf of any applicant.

7.2 Similarly, you must not be involved in decisions relating to discipline, promotion or pay adjustments for another employee who is a relative, partner, close friend, or where you have some other close personal relationship.

7.3 You must notify your senior line manager or Headteacher (or Chair of Governors or CEO) if the above circumstances arise.

8 CONFIDENTIAL AND OTHER INFORMATION

8.1 The Trust expects all employees to safeguard confidential and sensitive information, including when they leave employment.

8.2 You must not use any information obtained in the course of your employment for personal gain or benefit. You must not pass on such information to others who might use it in a similar way. All employees are under an obligation not to access or attempt to access information which they are not authorised to have.

8.3 Any deliberate breach of confidentiality, improper disclosure of information or misconduct in relation to official documents will be treated as a serious matter and may lead to disciplinary action.

9 USE OF TRUST/SCHOOL RESOURCES

You must ensure that you use Trust/school funds entrusted to you in a responsible manner ensuring value for money to the school and avoiding legal challenge to the Trust/school. You must observe the financial regulations and procedures.

10 SCHOOL PROPERTY AND FACILITIES

The resources of the Trust/school, including secretarial services, vehicles, premises, stationery and photocopiers must only be used for business purposes unless you have obtained permission for private use from your line manager or the Headteacher.

11 ELECTRONIC MEDIA

You must comply with the Internet/Electronic Media Policy and Guidance (for staff, trustees and governors) at all times together with any other relevant Trust/school policies and procedures in force at the time.

12 INTELLECTUAL PROPERTY, COPYRIGHTS AND LECTURE FEES

- 12.1 The Trust/school retains intellectual property rights for work undertaken by employees. Research, reports, designs, drawings, software developments or similar work, when created in the course of an employee's normal duties, remain the property of the Trust/school. These should not be removed from the school premises or passed on to a third party by an employee acting in a private capacity without the express consent of the Headteacher or CEO.
- 12.2 You may only retain fees for giving lectures or writing articles where these activities are not integral to your employment with the Trust/school, and are conducted in your own time.

13 WHISTLEBLOWING

- 13.1 The Trust expects employees who witness, or have their suspicions raised, or are approached to become party to potentially fraudulent, corrupt, dangerous or improper behaviour, to report these incidents or concerns using the whistleblowing reporting procedure.
- 13.2 The whistleblowing reporting procedure can be obtained from your line manager, Headteacher, the school office, iAM Compliant System or by contacting the Company Secretary.

14 OTHER EMPLOYMENT

- 14.1 You are required to declare any secondary employment. This includes second jobs within another Trust school or the Local Authority. If you do take any form of secondary

employment you must ensure that this does not adversely affect the performance of your job, conflict with the interest of the school or bring the school into disrepute.

14.2 Employees do not need approval to undertake voluntary work provided this does not conflict with the interests of the Trust/school.

14.3 If you are in any doubt as to the implications of taking up employment elsewhere, you must seek the approval of your Headteacher (or the CEO) before doing so.

15 TENDERING AND CONTRACTING

15.1 All orders and contracts must be awarded on merit in accordance with the Trust's policy. You must not show favouritism to businesses run, for example, by friends, partners, relatives or ex-employees, nor must you discriminate against any part of the community.

15.2 You must declare any private or domestic relationships with contractors or potential contractors to your Headteacher or the CEO.

15.3 If you are involved in the tendering process and dealing with contractors, you must make sure you are clear about the need for separation of client and contractor roles. If you are part of the senior management team with both a client and contractor responsibility, you must be aware of the need for accountability and openness. If you are in any doubt you must consult the Headteacher or CEO.

15.4 If you are privy to confidential information on tenders or costs for either internal or external contractors you should not disclose that information to any unauthorised party or organisation.

16 PERSONAL AND BUSINESS INTERESTS

16.1 Under the Local Government Act 1972 there are statutory provisions and penalties that apply to financial interests of local government employees. You must declare in writing to the Headteacher or CEO any financial or non- financial interests which might possibly conflict with the Trust's/school's interests or the interests of the stakeholders of the Trust/school. The school can provide you with a declaration form which will be kept.

16.2 If you are attending a meeting as an employee of the Trust/school at which decisions are to be taken in which you have a personal interest, you must also declare your interest formally to the meeting.

- 16.3** If in any doubt it is always best to declare an interest. It does not imply that you may act improperly but could protect you from claims or the potential appearance of doing so.

17 GIFTS AND HOSPITALITY

- 17.1** If an employee is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school/Trust they must discuss and register the offer with the Headteacher or CEO. In the case of the Headteacher, the discussion must be held with the Chair of Governors. In the case of the CEO, the discussion must be held with the Chair of the Trust. Full details are in the Trust's Gifts and Hospitality Policy.
- 17.2** It is an offence for employees to corruptly receive or give any gift, loan, fee, reward or advantage in order to influence official conduct. It is also an offence to accept any gift or consideration in the knowledge or belief that it is intended as inducement or reward, whether the employee receiving it is influenced or not. If you are found to have accepted or given any bribe, you will face disciplinary action, which could include dismissal for gross misconduct.
- 17.3** Employees do not have to register inexpensive gifts from pupils or parents but if they wish to do so they should contact the Headteacher or CFOO.

18 SPONSORSHIP – GIVING AND RECEIVING

- 18.1** Where an outside organisation wishes to sponsor or is sought to sponsor a Trust/school activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.
- 18.2** Where the school wishes to sponsor an event or service, neither you nor any relative or close friend must benefit from such sponsorship in a direct way unless you make a full declaration of interest to your Headteacher (or CEO) for the register of. Similarly, where the Trust/school through sponsorship, grant aid, financial or other means gives support in the community, you should ensure that impartial advice is given and that there is no conflict of interest involved.

19 DECLARATION OF INTERESTS

- 19.1 The Trust/each school holds a confidential register of interests. You must declare possible conflict of interest, as set out in this policy, in writing to the CEO/Headteacher who will provide a declaration form on request.
- 19.2 If you are in any doubt, it is always better to declare a potential conflict of interest. Do not wait until the end of the year or until you are asked. It does not imply that you intend to act improperly but could protect you from claims or the appearance of doing so.



EMPLOYEE CODE OF CONDUCT – Declaration of Interests Form

Employees must use this form to declare and register possible conflict of interest or relationships under the Code of Conduct for Employee. If you are in any doubt, it is always better to declare what may be a potential conflict of interest. Seek advice from your Headteacher or the CEO.

NAME

ROLE

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SCHOOL

Section of Code	Details of Interest

I confirm that I have read and understood my obligations under the Code of Conduct for Employees – The De Curci Trust; I confirm that I have declared all of my interest(s).

Signed
(Employee)

Date

Signed
(Headteacher / CEO)

Date

The De Curci Trust, a charitable company limited by guarantee registered in England and Wales with company number 10646541. Registered office address: Springfield School Central Road, Drayton, Portsmouth, Hampshire, United Kingdom, PO6 1QY.