



Code of Conduct

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1. Purpose of Policy

Bohunt Education Trust (the Trust) has introduced this Policy to provide the operational framework within which its ethos of Enjoy Respect Achieve is reflected in its processes for staff conduct (the policy area) and to ensure its legal duties and charitable purposes are met effectively.

2. Legislation and Guidance

This Policy complies with and discharges the Trust's legal duties with respect to [Keeping Children Safe in Education](#), and the Nolan Principles (See Appendix 2) It also complies with:

- [Employment Rights Act 1996](#)
- [Equalities Act 2010](#)
- [Worker Protection \(Amendment of Equality Act 2010\) 2023](#)

This policy also complies with our funding agreement and articles of association.

3. Definitions

This Code of Conduct sets out the Trust's requirements of its employees. However, all those carrying out work for or on behalf of the Trust, including trustees, governors, temporary workers, interim staff, consultants, business partners, volunteers and contractors are also required to adhere to the principles of the Code.

The Code of Conduct ensures that all those working for the Trust are aware of standards expected of them and/or the Trust, specifically that they do not commit and are not open to allegations of inappropriate behaviour, favouritism, abuse of authority or conflict of interest. The Code of Conduct and the associated guidelines should be read in conjunction with the Anti- Fraud, Corruption and Bribery Policy and the seven principles of Public Life, known as the Nolan Principles (See Appendix 2).

Trustees/Governors are also expected to follow the LGB Code of Conduct. Teachers are also required to comply with the Personal and Professional Conduct requirements laid down in the Department for Education's most recent Teachers' Standards document in addition to the Code of Conduct.

The Trust's disciplinary procedure aligns with this code of conduct. Failure to observe any of the standards in the code of conduct may lead to disciplinary action which could result in dismissal. Breaches of the code by workers who are not directly employed by the Trust may be referred to their employer and they may be stopped from working for the Trust with immediate effect. The Trust may reconsider its contractual relationship with contractors/agencies who do not take appropriate action in the event that their workers breach the standards expected in this code.

Please note that throughout this procedure the Head of School is defined as the officer to be notified. In cases where the Head of School is the "worker" then the person to be notified is the CEO. In cases where the CEO is the worker then the person to be notified is the Chair of the Trust Board.

4. Equalities Assessment Impact Statement

The Trust is committed to treating all people equally and with respect irrespective of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. We are committed to eliminating discrimination and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face or our duties under the Equality Act 2010. We have reviewed the effect of this policy on those who may face additional or different barriers to securing its benefits than the population as a whole and have identified that none are adversely affected.

5. Roles and Responsibilities

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

Everyone working for the Trust:

- is using Trust money and resources in their delivery or support of services to the Trust community;
- must display high standards of behaviour and conduct to instil public confidence in the integrity of BET as a whole;
- must act and be seen to act in accordance with the trust the public places in them;
- is expected to perform their duties with honesty, impartiality and objectivity and be held accountable for their actions;
- is expected to declare any direct or indirect personal interest which may create, or be seen to create, a conflict of interest with their duties;
- is expected to behave in a manner, at all times, that will not bring the Trust's reputation into disrepute.

It is the duty of all those working for the Trust in any form to familiarise themselves with this code, seeking clarity if uncertain about any of its content.

All workers have a responsibility to act in a way which ensures public confidence in their honesty and integrity. Public confidence can be affected by an individual's behaviour. BET seeks to maintain the highest standards of public confidence and requires the highest standards of behaviour from its workers. Workers must not conduct themselves in any way which might create doubt about their suitability to work for the Trust, or which has the potential to bring the Trust into disrepute or damage its reputation. Being charged, convicted or cautioned for criminal offences may mean that a worker is unsuitable for employment, even where there is no direct link between the nature of the offence and the work they undertake.

Perceived behaviour is also important in ensuring public confidence and workers must therefore act in a way that also avoids the appearance of any improper conduct or displays a conflict of interest. Workers must be able to demonstrate that their judgement and actions at work are objective and impartial and are not affected or influenced by personal considerations arising from any commitments and/or activities outside work.

The Board of Trustees are responsible for overseeing this Code across the Trust and in each School, the LGB is responsible. The Code of Conduct is available on each School's website and a copy will be provided to all workers, contractors and agency staff on introduction of the code and for new employees when they are recruited. The Code will also be shared with all contractors/agency workers when they are engaged to provide services to the Trust.

6. Respect for Others

Workers must at all times act with the respect that their colleagues, students and children are entitled to expect. To develop and maintain a positive, productive and embracing work environment it is important that colleagues treat each other and the children in their care well. Workers must treat others professionally and with respect at all times and unlawful discrimination will not be tolerated (see appendix I).

7. Declaration of Interests

By declaring interests, workers help maintain public confidence, avoid any suspicion of impropriety and protect themselves against allegations of wrongdoing. Declarations should be made no matter how remote the interest is or if considered by the worker to be insignificant: for further advice please see the Pecuniary Interests and Related Party Transaction Guidance for all staff, volunteers and others.

8. Reporting Responsibilities

Like all organisations, we have a way of doing things at BET which we all need to adhere to because of government legislation - or simply because it's the way that the Trust has chosen to do business. The way we do things is often referred to as governance but could be more simply described as 'doing the right thing.' Our governance framework is set within the Trust's constitution. The governance related advice makes it easy for you to do everything to standard and to escalate if something goes wrong.

- 8.1. Workers must ensure that they act at all times within their delegated authority as set out within the Trust's Scheme of Delegation. Workers must not make decisions (financial or non-financial) where they have no delegated authority to do so. Equally they should not be seen to act, either in person or in writing, on behalf of the Trust without the appropriate authority. This includes responding to reference requests for employees, which should be dealt with by the Head of School or HR. Responding to and/or providing information on behalf of the School/Trust without authorisation/agreement of the Head of School may result in disciplinary action being taken.
- 8.2. In addition to declaring interests all workers must immediately inform the Head of School/CEO/Chair of Trust Board as appropriate in writing of all police cautions, warnings, reprimands, arrests and/or convictions received during their period of employment/engagement with the Trust. This information will be treated in confidence and used to assess any impact on the worker's job, including the appropriateness for the worker to continue in their role. A caution, warning, reprimand, arrest or conviction will not automatically mean that a worker is unable to continue in their job. Whether there is a conflict with the worker's job will

depend on a number of factors including the nature of the offence, the type of job, the seniority of the worker and the extent to which the Trust's reputation or interests are damaged.

- 8.3. All workers have a duty to report any suspicion of fraud, theft, corruption, bribery or other wrongdoing by members of the public or Trust workers including colleagues, managers, governors, contractors, volunteers or partnership workers. Suspicions should be reported to the Head of School/CEO, the Chair of Governors/Trustees in accordance with the Anti-Fraud Bribery and Corruption Policy, or by following the Trust's whistleblowing procedure.
- 8.4. As set out in the Whistleblowing Policy, BET will not treat anyone less favourably solely because they have honestly reported or intend to report wrongdoing. Workers treating colleagues unfavourably in such circumstances will be liable to disciplinary action which could result in dismissal, as will workers who make malicious allegations. Non- School workers will be referred to their employer and/or their services stopped.
- 8.5. Employees should inform their Head of School of any employment they wish to undertake in addition to their role with BET. On appointment you are required to inform your manager of the number of hours worked for all paid employment you undertake, either with the Trust or another employer, in order to ensure the limits on working time, as specified in the Working Time Regulations, are adhered to. If, during the course of your employment you take up any other paid employment, you are required to inform the Headteacher/CEO.

9. Political Neutrality and Activity

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

- 9.1. Personal political views must not be promoted in the teaching of any subject in the School and must not interfere with providing balanced professional advice by/to Managers/Trustees/Governors. Workers must not allow their political views to influence service delivery, nor must they impose those views on students or colleagues. Where political issues are brought to the attention of the pupils, practical steps must be taken to offer a balanced presentation of opposing views to pupils while in attendance at School, while taking part in extra-curricular activities which are provided or organised by or on behalf of a School, and in the promotion at the Trust, including through the distribution of promotional material, of extra-curricular activities taking place at or elsewhere.
- 9.2. Workers who intend to undertake political activities should ensure that they are not in a role which forbids their proposed activities. If in doubt about the status of their role or about whether an activity is restricted, workers should seek written confirmation (email is considered sufficient) from their Head of School/Chair of Governors/Chair of Trustees.

10. Membership of Other Bodies

Workers are expected to consider carefully whether membership of, or association with, clubs, societies and other organisations such as lobbying groups and voluntary bodies could lead to the

impression that their official position might be used to promote a private or personal interest or undermine equalities. If there is a chance that it could, they should declare it.

- 10.1. The Trust's HR Director will maintain a register of staff, Governors and Trustees that belong to such organisations: membership must be declared to them.
- 10.2. In accordance with the Trust's guidance on pecuniary interests, workers and Governors/Trustees must in particular declare to the monitoring officer membership of any organisation or body which is or could be regarded as being:
 - A secret society;
 - Discriminatory (see Appendix 1);
 - In a contractual or potential contractual relationship with the School/Trust;
 - In receipt of benefit in cash or in kind from the School/Trust.
- 10.3. For the purposes of this code a secret society as mentioned in 10.2 is defined as one that:
 - Is not open to members of the public who are not members of that lodge, chapter, society, gathering, meeting or trust;
 - Places an obligation on the part of the member to make a commitment (by oath or otherwise) of allegiance to the lodge, chapter, society, gathering, meeting or trust.
- 10.4. The freemasons can be cited as the obvious example of a secret organisation but workers are asked to consider whether their membership of any group or body might fall within the definition set out above. If in any doubt they should discuss this matter with the monitoring officer.
- 10.5. A lodge, chapter, society, trust, gathering or meeting as defined above should not be regarded as a secret society if it forms part of the activity of a recognised religion, trade union or professional association.

11. Misuse of Position

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

- 11.1. Anyone working for the Trust must not, either in their professional or personal capacity, use their position improperly to gain an advantage or disadvantage over any person or organisation. Guidance on Pecuniary Interests provides more information.
- 11.2. If a worker is in a position to influence any decisions which are taken by, or on behalf of, the School/Trust and they have any interest in that decision, however remote, they must declare it; this includes membership of voluntary bodies who could be receiving School grants. Guidance on Pecuniary Interests provides more information.
- 11.3. No special favour may be shown to current or former colleagues or their partners, friends, relatives or associates when awarding contracts to private or other businesses run by them or who employ them in any capacity.
- 11.4. Workers must ensure that they declare to their Head of School any personal interest which may impinge on their impartiality to apply these regulations. Any

arrangements which might, in the long term, prevent (or be seen to prevent) the effective operation of fair competition must be avoided.

- 11.5. Workers must not lobby members of the Local Governing Body or members of the Board of Trustees on individual or personal employment matters including those associated with recruitment of themselves or others.

12. Safeguarding

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

- When recruiting to posts affording access to children and vulnerable adults the Trust's procedures to ensure safe recruitment must be followed as set out in the Safer Recruitment Policy.
- All workers are required to ensure they are familiar and compliant with the relevant national, Local Authority and School professional boundaries, codes of practice and legislation related to their job including data protection, safeguarding & child protection.
- All workers are expected to report any concerns of a safeguarding matter or acts/suspicion of abuse against children or vulnerable adults irrespective of whether this is inside or outside of work.

13. Finance and the Use of BET and Other Public Resources

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

In accordance with Anti-Fraud, Corruption and Bribery Policy, it is a criminal offence to defraud the Trust or its customers or partners: any such activity will be reported to the relevant authority (such as the police or HMRC) and the worker will be subject to disciplinary action which may result in dismissal.

All workers have a general responsibility for ensuring that the Trust's assets under their control are secure and that use of these assets is legal, properly authorised and achieves good value for money. Workers must also ensure that they act within the Trust's Scheme of Delegation and only approve expenditure where they have been delegated the appropriate authority to do so.

14. Communications, Electronic Media and Social Networking

The Trust uses a variety of methods to communicate with its workers, service users (students, parents/carers) and the community and to deliver services, including external and internal post and telephones, photocopying and printing, fax, email, internet or social media. These facilities are provided for BET business purposes only.

Communications using School facilities may be intercepted, recorded and monitored for business use and where appropriate for the detection and prevention of crime. This includes, but is not limited to, telephone calls, internet use, email and post.

The standards set out in this code apply to the use of electronic media such as email, internet, blogs and social networking sites the same as they would to traditional media such as newspapers, television and radio.

Workers must abide by Trust policies and procedures relating to the security of information, data protection and use of electronic media, including email and the internet.

Any use of social media such as Facebook, X (formally Twitter), LinkedIn, TikTok etc, during working time should be restricted to work related use only. Limited personal use of these types of sites and access to personal email is allowed during worker's break periods only but the standards set out in this code apply.

Whether at work or not, workers must not use social media or any other means of communication to:

- post information which is confidential or which constitutes intellectual property;
- make negative comments about the Trust, its services, workers, customers or anyone linked to the Trust;
- harass or bully other workers (cyber bullying);
- make discriminatory comments of any kind, particularly about anyone linked to the Trust;
- post pictures or details of the School students or colleagues without their express permission;
- communicate with students.

Workers must not:

- use their personal telephones (mobile or landline) to communicate with students and should only use School systems for any such communication; or
- provide students with their personal telephone numbers unless given express consent to do so by their Head of School.

Workers must notify the Head of School immediately if a student attempts to contact them on their personal telephone or via a social network

15. Confidentiality and Data Protection

The definition of what constitutes a confidential document is wide. Workers are required to take their duty of confidentiality seriously and ensure the confidentiality of all information. All workers need to be mindful of the requirements of the Data Protection Act 2018 and associated legislation and should familiarise themselves with the Trust's policies in this regard which are available on request.

- 15.1. The confidentiality of all information received at work must be respected and never be used for personal advantage or gain. Information given out in the course of a workers' duty must be true and not misleading.
- 15.2. Workers with access to confidential information should not disclose that information to any other party or organisation unless authorised to do so. This is particularly important in the case of information relating to action taken in relation

to conduct, capability, procurement, tender and contract costs (including those for in-house providers).

- 15.3. Access to information may be allowed to those who have a legal entitlement; such as the police as part of a criminal investigation. Workers providing such information have a duty to verify the identity of the person or organisation requiring the information. Any request for such information must be referred to the Head of School.
- 15.4. Any request for information from a third party e.g. references, press, legal representatives etc must be referred to the Head of School. Responding to and/or providing information on behalf of the School/Trust without authorisation/agreement of the Head of School may result in disciplinary action being taken.
- 15.5. Workers have a responsibility to ensure that electronic and paper data and information is kept secure at all times. Confidential information should not:
 - Be left unattended if being taken between home and work or between workplaces;
 - Be taken to entertainment or public places, such as cafes, restaurants, pubs and cinemas;
 - Be discussed where there is a possibility of being overheard.

Loss and misuse of information and data is a serious offence and is likely to result in disciplinary action which may lead to dismissal.

- 15.6. Misuse by a worker on leaving the Trust will be addressed through legal routes. (Also see section detailing contact with the media).
- 15.7. Some workers, because of the nature of their work, will be asked to sign a further confidentiality agreement.

16. Personal Financial Affairs, Data and Pay

In accordance with the Anti -Fraud, Corruption and Bribery Policy, workers must not conduct their personal financial affairs so that the Trust or another public body is defrauded or is otherwise denied the income and/or other resources to which it is entitled by law.

Workers have a responsibility not to be in debt to the Trust for any reason. In the event that such debt arises through genuine error or mistake, workers are required to make arrangements acceptable to the Trust for repayment of the debt.

Workers should check their pay on every payment occasion, reporting any anomalies to their Head of School and payroll provider immediately. Overpayments and underpayments will be rectified or made good. It is in the worker's interests to have this arranged as soon as possible.

Income tax is a personal responsibility and the Trust will not be liable for any underpayment of tax. It is each individual's responsibility to ensure that the tax code on their pay slip is correct and any errors should be reported to the payroll provider as soon as possible.

It is the personal responsibility of every worker to ensure the Trust has their up to date personal contact details. Personal contact details may be needed for a variety of business reasons including consultation, informing of contractual changes, contact during periods of absence and/or in an emergency. The Trust will not be held responsible for a worker's failure to update their own information. Changes should be done on the appropriate electronic system or through the appropriate School officer if the worker does not have access to that system.

17. Relationships

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

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

18. Contractors and Suppliers

Workers must declare any external relationships of a business or private nature with external contractors or suppliers or potential contractors and suppliers to the monitoring officer, in accordance with the Guidance on Pecuniary Interests and related party Transactions.

Workers who authorise, engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a business or private relationship with a contractor who is engaged or who is proposed to be engaged by the Trust, should declare that relationship to the monitoring officer as soon as practicable. The monitoring officer should declare any interests to the Governance Lead and CEO.

When tendering, workers must declare any interest (and interest of their spouse, partner, family member, friend or associate), business or private relationship or association with any School contractor or potential contractor in accordance with the Guidance on Pecuniary Interests and related party Transactions.

19. Parents, Carers, Students (Service Users) and the Community

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

Workers must maintain professional boundaries and avoid developing inappropriate personal relationships with service users. In particular, the development of unprofessional personal relationships or friendships with vulnerable students, families, carers or service users, such as borrowing and lending money, giving and receiving monetary or extravagant gifts, sexual intimacy, or showing preferential treatment to students, families, carers or other service users will be regarded as a misuse of position no matter how well intended.

In exceptional circumstances, such as where a student has to be lent money to cover their fare home, the loan will be acceptable but the worker lending the money must declare it immediately.

20. Work Colleagues

Relatives, spouses, partners or close personal friends are not allowed to be involved in the processes and decisions relating to employment issues, including but not limited to: appointment, performance; discipline; authorising financial payments; determining pay or conditions of employment in accordance with the Guidance on Pecuniary Interests and related party Transactions.

Workers responsible for the appointment of staff must ensure that decisions are based on merit and not on anything other than ability to do the job. Similarly, they must not canvas on behalf of any applicant. If a candidate is known to a worker but is not a relative, spouse, partner or close personal friend, they may sit on the interview panel, but must declare the relationship to other members of the panel prior to the interviews. This applies to the appointment of permanent and temporary staff, including agency workers and consultants.

Workers must declare any personal relationships that exist or develop, in the circumstances detailed above, to the monitoring officer.

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

21. Alcohol or Drugs

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

The use of alcohol and/or drugs must not impair the performance of contractual duties and safe, efficient and effective service delivery.

With the exception of work-related events where provision of alcohol has been authorised, alcohol must not be consumed during working hours.

Alcohol, drugs or substances consumed outside of or during working hours must not affect a worker's ability to do their job or have the potential to damage the Trust's reputation or the worker's own credibility. Presenting for work with clothing or breath smelling of alcohol or drugs is likely to raise reputational concerns that may lead to disciplinary action.

Workers deemed to be under the influence of any substance likely to compromise safety or service delivery may be subject to drug and alcohol testing and/or disciplinary action which may result in dismissal.

Workers who suspect a colleague of being under the influence of alcohol and/or drugs at work must report this to their line manager or to a more senior manager if it is their line manager under suspicion.

22. Contact with the Media

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

Workers are not allowed to discuss issues with the press or public or disclose information or documents on BET business unless expressly authorised to do so by the Head of School, or Director of Communications. Unless authorised to do so, workers must not speak, write or give interviews to the media. If approached by the media, workers should refer the enquiry to the Head of School and Director of Communications.

BET workers should not bring the Trust's name into disrepute by publicising any material which is against the interests of the Trust or is defamatory to representatives, trustees, Governors, partners, pupils or work colleagues.

The standards set out in this document apply in the same way to information published and comments made through electronic media including email, the internet, social networking sites and blogs, as they do to traditional written media, newspapers, radio and television.

23. Health & Safety

Workers will at all times adhere to Health and Safety policies and procedures, taking personal responsibility to keep up to date with any changes.

Any worker who is using the services of a contractor on site will ensure they are aware of and understand School H&S Procedures in advance of them starting work on any project

24. Training for Staff, Volunteers, Governors/Trustees

Everyone will be required to read this Code as part of their induction and annual refresher training run every September. If there are any provisions which are unclear or there is uncertainty how they would apply in any particular situation, they should seek advice from Head of School, CEO, Director of HR, Director of Communications, Director of Governance or Chief Financial Officer.

25. Monitoring Provisions

The Finance, Audit and Remuneration Committee will review this policy at least every three years. Data relating to incidents under this policy is reviewed termly at LGB and FAR Committee.

26. Links to Other Policies

This policy links to:

- Equalities Objectives
- Finance Policies
- Anti- Fraud, Bribery and Corruption policy
- Health and Safety Policy
- Disciplinary and Grievance Policies
- Capability Policy
- Dignity at Work Policy

- Child Protection and Safeguarding
- Whistleblowing

All of which can be found on the [BET website](#) and on [BET People](#)

Appendix I: Standards of Behaviour

Standards of behaviour

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

All workers, volunteers and customers are entitled:

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

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

Discrimination and offensive behaviour

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

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

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- religion or belief
- age
- sexual orientation
- gender reassignment
- pregnancy or maternity
- being married or in a civil partnership

Discrimination can take a number of different forms:

- Treating a person **worse** than another person because of a protected characteristic (this is called **direct discrimination**).
- Doing something which has (or would have) a worse impact on a person and on other people who share a particular protected characteristic than it has on people who do not

have the same characteristic. This form of discrimination may not be unlawful if it can be shown to be **objectively justified**.

- Treating a person **unfavourably** because of something connected to their disability where you cannot show that what you are doing is **objectively justified**. This is called **discrimination arising from disability**.
- Treating a person worse than another person because they are **associated with** a person who has a protected characteristic.
- Treating a person worse than another person because you think they have a protected characteristic (**perception**).
- Treating a person badly or **victimising** them because they have complained about discrimination or helped someone else complain or have done anything to uphold their own or someone else's equality law rights.
- **Harassment**: often related to bullying, this is unwanted behaviour towards another person, that:
 - has the effect of violating that person's dignity or
 - creating for that person an intimidating, hostile, degrading, humiliating or offensive environment.

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

Sexual Harassment is a specific form of harassment, and it can often be subtle, indirect, or even unintentional. Sexual harassment includes unwanted or unwelcome sexual advances, requests for sexual favours, or other verbal, physical, or visual conduct of a sexual nature within the workplace. It also covers any third-party harassment where a person is harassed by someone who does not work for the Trust, such as a parents, contractors or visitors.

The Trust recognise the seriousness of sexual harassment, and we have zero tolerance towards this. We run training on what Sexual Harassment is and how it is prevented, and tackled if it occurs.

Employees are encouraged to report any incidents of harassment by colleagues or third parties which they experience or witness. Obvious examples are:

- Unwanted touching or physical contact.
- Sending or displaying sexually explicit or suggestive materials.
- Making seemingly "harmless" jokes, comments or gestures with a sexual undertone.
- Suggesting or implying that employment, promotion, or other benefits depend on sexual favours.
- Asking personal questions about someone's romantic or sexual life.
- Repeatedly giving compliments on someone's appearance, dress, or body that go beyond normal workplace politeness.
- Standing too close, touching, or brushing against someone unnecessarily.
- Persistently asking someone out on dates or inviting them to social activities outside of work after they have declined or shown disinterest.

Please remember that the examples of **UNWELCOME, UNINVITED AND UNRECIPROCATED** behaviour outlined in this document represent a non-exhaustive list.

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

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

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

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

Type	Description	Examples (but not limited to)
Sexual harassment	Unwelcome sexual advances, requests for sexual favours or other conduct of a sexual nature which makes the recipient feel threatened or compromised. This means any harassing conduct based on gender or sexuality.	Gestures, leering, getting too close, hanging pin-ups, bringing in offensive publications, writing offensive letters or memos, giving unwanted gifts, using suggestive language, making unwanted propositions, telling sexually explicit jokes, using affectionate names, asking personal questions, groping, touching, using innuendos, indecent exposure and/or screen savers.
Racial harassment	Derogatory remarks, racially explicit statements, graffiti, jokes or any other action of a racist nature which results in the recipient(s) feeling threatened or compromised.	Gestures, facial expressions, offensive publications, graffiti, threats, racial abuse, racist jokes, nicknames, labels, assault.
Disability harassment	Derogatory remarks, staring, mimicking, invasive personal questions, ostracising or patronising which is directed at any individual with a disability, or groups of disabled people, which results in their feeling threatened or compromised.	Mimicking, ignoring wishes or feelings, ostracising, staring, laughing at a disability, copying a speech impairment, inappropriate terminology (e.g. cripple or spastic), personal questions, jokes, patronising comments, nicknames, unwanted moving of a wheelchair, hiding a disability aid, touching a visually impaired person.
Religious belief harassment	Behaviour which fails to acknowledge and respect the rights or needs have people's religious beliefs or practices.	Mimicking, staring, drawing offensive symbols , hanging offensive images, making fun of headgear (e.g. skull cap, turban , hijab) criticism for taking religious holidays off, offensive name calling, assault, removing religious objects
Equality-related conflict	The Trust recognises that people have the right to hold different religions and beliefs and will make reasonable provisions to help employees practice their religion or belief e.g. through flexible working hours and providing a quiet area for prayer. Practicing a religion or belief at work in a way that may cause offence to another protected characteristic.	An employee shares a workstation with a gay man who openly discusses his lifestyle and relationship with another man. The employee requests to move on the basis that her religion regards such behaviour as sinful and contrary to the laws of her God. Such a request may be perceived as offensive towards the gay man.

Appendix 2: The Nolan Principles

The Seven Principles of Public Life, known as the Nolan Principles, were defined by the Committee for Standards in Public Life.

They are:

1. Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.

2. Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

3. Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

4. Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

5. Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.

6. Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest

7. Leadership

Holders of public office should promote and support these principles by leadership and example.