St. Matthew's C of E Primary School
Policies

St. Matthew's
CofE Primary School

"Let all that you do be done with love." 1 Corinthians 16:14"

Our Policy:
Code of Conduct

Approval Date: September 2025
Review Date: September 2026

Version Control

Current version	Previous version	Summary of changes made
26 Jul 17	04 Nov 14	Appendices renumbered. Formatting of paragraphs, headings and appendices standardised.

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Guidelines

The Code of Conduct for school employees lays down proper standards of conduct for employees of the School in order to maintain and improve standards of conduct as well as protecting them from any misunderstanding or criticism.

These guidelines have been produced to assist with the implementation of the Code of Conduct and must be read in conjunction with the code itself.

The code applies to all employees of the school.

On no account should an employee accept financial payment or other inducement from any person, body or organisation e.g. Contractors, Developers, Consultants etc. Section 117 of the Local Government Act 1972 makes it an offence for an employee of a school to accept any fee, gift, loan or reward whatsoever, other than their proper remuneration.

The onus is on an employee to declare offers of gifts and hospitality and any contravention of the Code of Conduct could result in, or be taken into account in, disciplinary proceedings.

An employee must complete Appendix D if they have any personal interests or involvement, which may conflict with their employment or with the interests of the school.

Declarations of interest or hospitality by Head Teachers will be submitted to the Governors and declarations of interest or hospitality by the Chair of Governors will be forwarded to the Children's Services Finance Officer and the Director of People.

An employee must complete Appendix B if they are offered any gifts or hospitality whether or not they are accepted or refused. Please refer to Section 12 paragraphs 12.1 to 12.8 in the Code of Conduct for further guidance.

The Monitoring Officer (Director of People) will maintain a register of declared interests. The register will be accessible only to the Monitoring Officer and other authorised officers for the purpose of ensuring that proper standards of conduct are maintained, and in accordance with Section 15.

If in any doubt an employee can seek advice from their Senior HR Adviser.

Introduction

St Matthews C of E Primary School is committed to achieving and maintaining the highest possible standards of conduct.

The school is justifiably proud of the conduct of its employees but recognises the working environment is constantly changing and bringing with it a greater commercial emphasis.

This Code of Conduct lays down standards of conduct for employees of the school to maintain and improve proper standards of conduct as well as protecting them from any misunderstanding or unfair criticism

This code will apply to all employees of the school.

Where an employee has serious concerns about an aspect of the schools work or those who work for the school, then the Whistleblowing Policy would apply. In such circumstances employees can raise concerns about malpractice in the conduct of the schools business, or in the workplace, suspicions of criminal acts, miscarriages of justice and dangers to health and safety.

The Head Teacher of the school is designated as the school's monitoring officer.

Disclosure of information

The law requires that most of the work undertaken by the school should be open to inspection and that certain types of information should be available to Ofsted, Local Authority, Department for Education, Parents and Governors. There are exceptions to this which include;

- confidential or 'exempt from publication' information discussed at meetings of the council, Executive, Executive Member Meetings, Committees and other meetings when the press and public have been excluded e.g. governors meetings, staff meetings or child protection
- commercially sensitive information in relation to contracts for the supply of goods or services
- personal information relating to children and young people, employees and governors of the school

Under no circumstances must employees use or disclose any information obtained during their work for the personal gain or benefit of themselves, or others, associated with them.

Political neutrality

Employees provide a service for the school as a whole; therefore, they have a responsibility to serve all governors and not just those of the controlling group.

Employees must not allow their own personal or political views, or interests, to influence them in their work

Relationships

Relationships with other Employees
Mutual respect between employees is essential to ensure good working relationships. The Grievance Policy has been implemented to protect the dignity and respect of all employees within the workplace.

Relationships with governors or elected members of the Local Authority
Mutual respect between employees, governors and elected members of the Local Authority is essential to good local government; however, close personal familiarity between employees, governors and Elected Members could damage this relationship and should, therefore, be avoided.

Relationships with the local community and children and young people
Employees of the school have a responsibility to the local community, children and young people and should ensure courteous, efficient and impartial service delivery to all groups and individuals in line with school policies.

Relationships with contractors
Employees should disclose details of any relationship, of a private or business nature, with any current or proposed external contractors or suppliers to the Head Teacher.

If an employee has any doubts about their relationship with an external contractor or supplier, they should complete Appendix D.

Orders and contracts must be awarded on merit, without discrimination or favour, by means of fair competition against other tenders in accordance with the school's standing orders and the schools financial regulations.

Recruitment and selection of staff

The schools Safeguarding, Disclosure and Barring Policy, and other relevant policies, must be applied when recruiting to any vacant post. This will ensure appointments are made on merit and the most appropriate person is recruited.

In order to avoid any possible accusation, or appearance, of bias employees should not be involved in any selection process where they are related to an applicant or have a close personal relationship outside work with the applicant.

Similarly, employees should not be involved in any decisions on discipline, grievance, promotion or pay for any employee who is a relative, partner, friend or person in respect of whom the employee's involvement could reasonably be perceived to be prejudicial or biased.

Outside commitments

Before taking any other additional employment or private work, outside of the work done as an employee of the council, employees should check with the Head Teacher whether the written permission of the school is required.

Employees should be clear about their contractual obligations to the school and should not undertake additional employment, or involvement, which might conflict with or detract from the interests of the school.

Employees need to be aware that any information they may have gained in the form of intellectual property, copyright or work in any form which they have carried out or created and which has arisen from them undertaking their duties as an employee of the school belongs to the school and, therefore, cannot be sold or lent to any other person or organisation without the written permission of the Head Teacher in consultation with the Chair of Governors.

Personal and other interests or involvements

Employees must complete Appendix D, if they have any personal interests or involvement which might conflict with their employment or with the interests of the school.

Interests or involvement which could conflict with the interests of the school could be either financial or non-financial for example;

- partnership in a business
- work done for any person or organisation other than as an employee of the school
- serving as a member of a group, committee or board which may work in conflict with the school
- applications submitted by relatives or friends for consideration by the school, i.e. tendering for work

The Head Teacher will maintain a register of declared interests. The register will be accessible only to the Head Teacher, Governors and other authorised employees of the school, for the purposes of ensuring that proper standards of conduct are maintained and in accordance with paragraph 14.2. Individual employees will only have access to information recorded in respect of themselves if requested.

The register will be reviewed annually; however, if an employee's circumstances change in the meantime, they can make a voluntary declaration using Appendix D.

If any employee has a personal interest in any matter which arises at any meeting where the employee is reporting or advising, or might be called upon to advise or otherwise be able to influence, governors of the school, or any third party; the employee must declare the interest and take no part in the consideration or determination of the matter.

Any such declaration made at an official meeting will be recorded in the minutes. If appropriate, arrangements should be made for another employee to attend and report or advise on the matter.

Valuing diversity issues

In accordance with the school's Equality Policy all members of the local community, governors, children and young people and employees have a right to be treated with dignity and fairness.

Separation of roles during the tendering process

Employees involved in the tendering process and dealing with contractors must be clear on the separation of both client and contractor roles within the school.

Some employees may have both a children and young people client and contractor responsibility and must be aware of the need for accountability and openness at all times.

Employees who are privy to confidential information on tenders or costs for either internal or external contracts must not disclose that information to any unauthorised party or organisation.

Corruption

Employees must be aware that it may be deemed to be corrupt for an employee to receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour, or disfavour, to any person in their official capacity; and could amount to a criminal offence as well as gross misconduct and so place the employee at risk of criminal sanction as well as disciplinary proceedings.

Use of financial resources

Employees must exercise due probity and responsibility in accordance with the school's standing orders and financial regulations in the use of school resources.

They must ensure value for money at all times and seek to avoid legal challenge to the school. Employees must ensure expenditure is authorised appropriately and obtain proof of spending in accordance with the school's financial regulations.

Financial inducements, gifts and hospitality

On no account should an employee accept financial payment or other inducement from any person, body or organisation, e.g. contractors, developers, consultants etc. Section 117 of

the Local Government Act 1972 makes it an offence for an employee of the school to accept any fee, gift, loan or reward whatsoever, other than their proper remuneration.

As a general rule, employees should also refuse any gift or hospitality offered to them or to members of their family. There may be exceptions for gifts which are of negligible value and are usually given to a wide range of people, e.g. pens, diaries, calendars etc. Any more substantial gift should be returned officially with a suitable letter unless specifically sanctioned by the Governors or Head Teacher.

All gifts offered (except those of negligible value as indicated above), whether accepted or refused, must be recorded within school and signed by the Head Teacher using Appendix B. If in doubt seek advice from the Head Teacher, who may seek advice from the Chair of Governors if necessary.

Normally, visits to exhibitions, demonstrations, inspection of equipment, conferences, business meals, social functions etc. by employees in connection with their official duties will be at the school's expense to avoid jeopardising the integrity of subsequent purchasing decisions. In some instances, however, it may be to the benefit of the school to accept the hospitality of outside agencies, organisations or individuals. This will be a decision for the Head Teacher or Chair of Governors to make. If it is decided to accept the invitation, the reason for the meeting and the form the hospitality takes must be recorded within the school using Appendix B. If in doubt seek advice from the Head Teacher, who may seek advice from the Chair of Governors if necessary.

When accepting or receiving authorised hospitality employees and should be particularly sensitive as to its timing in relation to decisions which the school may be taking affecting those providing the hospitality.

Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is related to school activity rather than personal and where attendance has been authorised in advance and the school is satisfied that any purchasing decisions are not compromised.

If any employee is in any doubt over financial inducement, gifts or hospitality, they should refer the matter to the Head Teacher, who should consult the Chair of Governors if necessary.

The essential principle is that favours must not affect nor compromise working relationships.

The onus is on employees to declare offers of gifts and hospitality and Appendix B must be completed. If in doubt seek advice from the Head Teacher, who may seek advice from the Chair of Governors if necessary.

Sponsorship

Where a company wishes to sponsor, or is seeking to sponsor, an event being run or managed by the school, be it by invitation, tender, negotiation or voluntarily, the same conditions of accepting gifts or hospitality as outlined above will apply.

In the event of the school sponsoring an event then neither an employee nor their partner, spouse or relatives must benefit from such sponsorship, without there being full disclosure using Appendix B.

Failure to comply with the code of conduct

Any contravention of this Code of Conduct could result in, or be taken into account in, disciplinary proceedings.

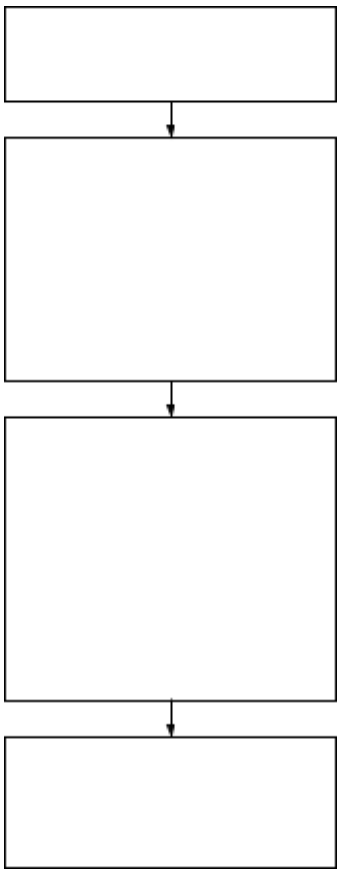
Should there be a need to undertake an investigation into an employee's standard of behaviour it will be necessary to examine the registers, attached at Appendix B and Appendix D, and any evidence obtained from these sources may, together with any other information, be used to assist with the investigation.

Application of the code of conduct

The code embodies general standards of conduct for all employees of the school. It is recognised, however, that arrangements will need to be made with the school to address specific circumstances encountered by employees.

Date of Policy:	**September 2025**
Date agreed by Governors:	**September 2025**
Next Review Date:	**September 2026**

Employee is offered gifts of hospitality



As a general rule employees should refuse any gift or hospitality offered to them or members of their family. There may be exceptions to gifts which are of negligible value and are usually given to a wide range of people for example pens, diaries, calendars etc. Any more substantial gifts should be returned officially with a suitable letter unless specifically sanctioned by a Head Teacher.

Acceptance of hospitality by employees through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal in nature and where attendance has been authorised in advance and the school is satisfied that any purchasing decisions are not compromised.

Please refer to Section 12 for further guidance.

APPENDIX B

Register of gifts and hospitality

Employee details
Name
Position Name
School

Details of offer
Please provide details of the gift, hospitality or invitation offered. Continue on a separate sheet if necessary.

Estimated value of gift, hospitality or invitation

Name of person or organisation making the offer

Reason for gift, hospitality or invitation being offered

Has the offer been accepted Yes □ No □

If accepted, has permission been sought Yes □ No □

Decision
To be completed by the Head Teacher or Chair of Governors.

Permission granted for accepting the gift, hospitality or invitation Yes □ No □

Date gift, hospitality or invitation returned unaccepted

Person or organisation notified of non-acceptance **Date**

If gift donated to charity, state the charity

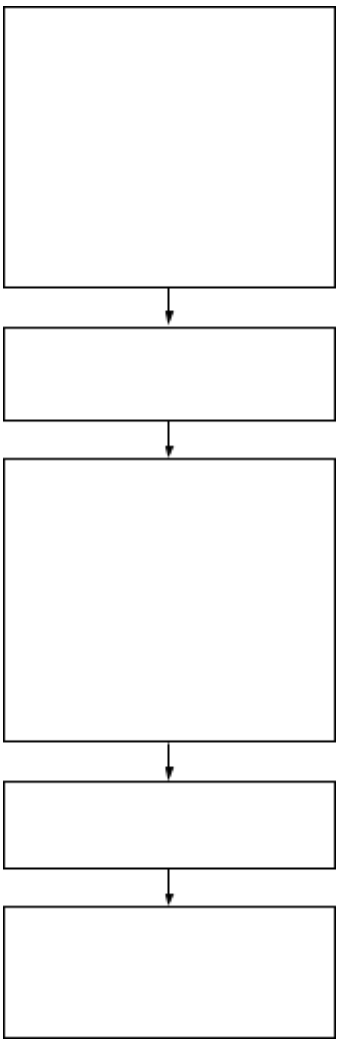
Date person or organisation informed gift been donated to charity

Date employee notifying of the decision

Signed	**Date**

APPENDIX C

Employee has a personal interest or involvement



Interests or involvement which could conflict with the interests of the school could be either financial or non-financial. Examples include partnership in a business, work done for any person or organisation other than as an employee of the school, serving as a member of a group, committee or board which may work in conflict with the school, applications submitted by relatives or friends for consideration by the school i.e. tendering for work.

If an employee has a personal interest in any matter which arises at any meeting where the employee is reporting or advising (or might be called upon to advise, or otherwise be able to influence) any member of the school, or any third party, the employee must declare the interest, and take no part in the consideration or determination of the matter. Any such declaration made at an official meeting will be recorded in the minutes. If appropriate, arrangements should be made for another employee to attend and report/or advise on the matter.

Please refer to Section 8 for further guidance.

APPENDIX D

Register of personal interests or involvements

This form must be used to declare business, financial, private, personal and other interests or involvements. It should be completed where the Head Teacher or Chair of Governors consider duties undertaken warrant completion. Please continue on a separate sheet if necessary.

Employee details	
Name	
School	**Job Title**

Information required		**Detail**
Business	Name and address and nature of additional business, or other employment interests.	
Consultancy	Name and address of company, firm or other body or individual on behalf of whom consultancy is undertaken and nature of the consultancy, with an indication of frequency or volume of such work.	
Directorships	Name, address and nature of business of each Company/other body of which you are a Director, with an indication of whether it is in a paid or unpaid capacity.	
Partnerships	Name and address and nature of business of each firm with which you are a partner.	
Shareholders	Name and address and nature of business of each Company in which you hold shares (excluding Building Societies shares). Please note; Only beneficial shareholdings need be declared, i.e. not shares held as a trustee. Shareholdings need only be declared if the total nominal value exceeds £1,000 or 1/100th of the total nominal value of the issued share capital of the company, whichever is less. The amount of the holding need not be stated. Unit trust holdings need not be stated.	

Information required		Detail
Interests in land within the authority	Address or description of land or property in which you have an interest, the nature of the interest and the use to which the land is put. Please note; i. Interests as a freeholder or leaseholder for a lease of 12 months or more should be declared. Interests as an option holder or prospective purchaser should be declared. Interests by which you are directly concerned in seeking planning permission or some other consent or decision of the Council should be declared. You need not declare interests in land or property outside the Borough.	
Retainers	Name and address of the organisation to whom you are engaged on a retainer basis and the nature of the retainer.	
Memberships and associations	List any organisation with which you have membership or association, including clubs and societies.	
Voluntary bodies	List any voluntary bodies of which you have membership or association.	
Further information	Please give any further information you may wish to record about your business or financial interests.	

Declaration	
I hereby declare these interests that may be relevant to, or be likely to affect, my employment with this school. I declare that the above information is correct to the best of my knowledge and belief.	
Signed	**Date**