



# **ASCENT ACADEMIES' TRUST**

## **CODE OF CONDUCT**

<b>Policy reviewed and approved</b>	<b>January 2022</b>
<b>Version</b>	<b>V6.0</b>
<b>Review frequency</b>	<b>2 years</b>
<b>Date of next review</b>	<b>January 2024</b>
<b>Responsible Officer</b>	<b>Chief Operating Officer</b>

## CODE OF CONDUCT FOR ACADEMY EMPLOYEES

<b>INDEX</b>	<b>Paragraph no.</b>
Purpose	1
Scope	2
Standards and Attitudes	3
The Principles	4
Confidentiality and Disclosure of Information	5
Confidential Reporting Policy	6
Political Neutrality	7
Relationships	8
Outside Commitments	9
Conduct	10
Additional Work	11
Additional Work (Internal)	12
Refusal of a Request to take on Additional Work	13
Books, Training Materials and Intellectual Property Rights	14
Patents and Inventions	15
Computer Use	16
Misuse of Computers	17
Use of Social Networking Sites	18
Personal Interests	19
Gifts and Hospitality	20
Gifts Generally	21
Hospitality	22
Sponsorship – Giving and Receiving	23
Equality	24
Tender Procedures	25
Corruption	26
Financial Procedure Rules	27
Medical Needs and Medication	28
Annex A	Code of Conduct for Trustees
Annex B	Gifts and Hospitality

# CODE OF CONDUCT FOR ACADEMY EMPLOYEES

## 1. PURPOSE

1.1 The purpose of having a Code of Conduct is to:

- make a clear statement about the standards of conduct expected of employees of the Ascent Trust
- ensure the highest standards of conduct by identifying Trust standards which sit alongside professional codes and guidelines
- help all employees to act in a way which upholds the Trust standards and at the same time, protect them from criticism, misunderstanding or complaint.
- help build trust between the Trust and the people who come into contact with those working for it.

## 2. SCOPE

2.1 This Code of Conduct applies to:

- All employees of the Ascent Academies' Trust. Employees are as defined in section 230 of the Employment Rights Act 1996 or any subsequent legislation.
- Individuals providing services for the Trust e.g. contractors, agencies, self-employed, and those working for the Trust as part of partnerships with the Trust.

2.2 Disregarding this Code will in certain circumstances result in disciplinary action being taken. All employees will be supplied with a copy of this Code, against which their conduct will be measured.

2.3 Trustees are covered by their own Code of Conduct which is attached at Annex A.

2.4 The Code of Conduct should be read in conjunction with

- Confidential Reporting Policy
- Anti-Fraud and Corruption Policy
- Staff IT Acceptable Use Policy
- Social Media Policy
- Staff Official Social Media Acceptable Use Policy
- Wi-Fi Acceptable Use Policy
- Finance Policy
- Pay Policy
- Grievance Policy
- Safer Working Practices Document
- Behaviour regulation policy
- Intimate Care Policy
- Child Protection and Adult Safeguarding Policies

## 3 STANDARDS AND ATTITUDES

3.1 All employees of the Trust are expected to give the highest possible standard of service to the public, Trustees and fellow employees.

- 3.2 We work with the most vulnerable young people and therefore we must always act in the best interest of children and young people. The attitude of employees in dealing with people (students, parents/carers, visiting professionals and colleagues) reflects on the Trust so it is important that they are constructive, polite and courteous. People's impression of the Trust is strongly influenced by the views of the people who work for it. Whether or not employees are aware of it, the comments they make will be accepted by others. Employees, therefore, need to consider carefully the impact of what they say.
- 3.3 All employees are expected to report to their manager or supervisor any perceived or anticipated impropriety, breach of procedure or policy of the Trust.
- 3.4 In all cases it is not enough to avoid actual impropriety as public perceptions are very important. Employees should at all times avoid any appearance of improper conduct which may give rise to suspicion.
- 3.5 The high standard of behaviour that is expected from staff in and around the academy is equally expected when staff are engaged in extra-curricular activity including residentials and community visits. All staff should follow Trust and Academy policies and ensure our young people are treated with dignity and respect. This is so important when we are supporting children and young adults with personal and intimate care routines.
- 3.6 There are a number of principles that exemplify the standards that are required. They are set out below. A number of these aspects are dealt with in more detail within this Code.

## **4. THE PRINCIPLES**

### **4.1 Honesty, Integrity, Impartiality and Objectivity**

All employees must perform their duties with honesty, integrity, impartiality and objectivity.

### **4.2 Accountability**

All employees must be accountable to the Trust for their actions.

### **4.3 Respect for Others**

All employees must:

- Treat others with respect
- Ensure that young people are treated with dignity and respect
- Ensure that information about children and young people and our families is only shared on a need to know basis.
- Ensure that decisions are taken with regard to the Ethical Leadership Framework
- Not discriminate unlawfully against any person; and
- Treat Trustees professionally.

#### 4.4 **Stewardship**

All employees must:

- Use any public funds entrusted to or handled by them in a responsible and lawful manner; and
- Not make personal use of property or facilities of the Trust unless properly authorised to do so.

#### 4.5 **Personal Interests**

All employees must not in their official or personal capacity:

- Allow their personal interests to conflict with the Trust's requirements; or
- Use their position improperly to confer an advantage or disadvantage on any person.

#### 4.6 **Declaring Interests**

All employees must comply with any of the Trust's requirements:

- To declare interests; and
- To declare hospitality, benefits or gifts received as a consequence of their employment.

#### 4.7 **Openness**

All employees must NOT:

- disclose information given to them in confidence by anyone, or information acquired which they believe is of a confidential nature, without the consent of a person authorised to give it, or unless they are required by law to do so; and
- prevent another person from gaining access to information which that person is entitled to by law.

#### 4.8 **Duty of Trust**

All employees must at all times act in accordance with the trust that the public is entitled to place in them.

#### 4.9 **Safeguarding**

All employees must undertake their work in accordance with requirements laid down (for their job) in support of the Trust's duties for safeguarding children and young people.

### 5. **CONFIDENTIALITY AND DISCLOSURE OF INFORMATION**

- 5.1 The Trust recognises the importance of an open, transparent culture with clear communication and accountability. It is the Trust's aim to be as open as possible about all its activities. The law requires that certain types of information must be available to auditors, government departments, service users and the public. Different rules apply

in different situations. If an employee is in any doubt as to whether they can release any particular information, they should always check with the Head of Academy<sup>1</sup> first.

- 5.2 The confidentiality of information received in the course of an employee's duties should be respected and must never be used for personal or political gain. Employees must not knowingly pass information on to others who might use it in such a way. If an employee believes that information should be disclosed in the public interest they should follow the Confidentiality Reporting Policy before doing so (see paragraph 6). Failure to do so may result in disciplinary action being taken.
- 5.3 Employees must not communicate confidential information or documents to others who do not have a legitimate right to know. Furthermore, information which is stored, whether on computer systems or manually, must only be disclosed in accordance with the requirements of the General Data Protection Regulation.
- 5.4 Information given in the course of an employee's duties should be accurate and fair and never designed to mislead.

## **6. CONFIDENTIAL REPORTING POLICY**

- 6.1 Employees may often be the first to realise that there may be something seriously wrong within the Trust. However, they may be reluctant to express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Trust. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 6.2 The Trust is committed to the highest possible standards of openness, probity and accountability. In line with that commitment employees, and those associated with the Trust, who have serious concerns about any aspect of the Trust's work, are expected to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.
- 6.3 In order to ensure that this can happen the Trust has adopted a Confidential Reporting Policy. This encourages anyone who has concerns about how the Trust and its' employees behaves, to do so without prejudice.
- 6.4 The Confidential Reporting Policy is intended to encourage and enable employees to raise serious concerns within the Trust rather than overlooking a problem or 'blowing the whistle' outside.
- 6.5 The policy applies to all employees and those contractors working for the Trust on Academy premises, for example, agency staff, builders, drivers. It also covers suppliers and those providing services under a contract with the Trust in their own premises.
- 6.6 The policy is in addition to the Trust's complaints procedures and other statutory reporting procedures.
- 6.7 The policy has been discussed with the relevant trade unions and professional

---

<sup>1</sup> The Head of Academy can delegate duties to other members of the Leadership Team. In cases relating to the interests of the Head of Academy matters should be referred to the Chief Executive

organisations and has their support.

## **7. POLITICAL NEUTRALITY**

Employees must not allow their own personal or political opinions to interfere with their work and must at all times perform their duties in an objective manner.

## **8. RELATIONSHIPS**

- 8.1 The Trust is firmly committed to equal opportunities and believes that every employee has the right to work in a safe environment without the fear of discrimination, harassment or abuse. The Trust will not tolerate or condone harassment or bullying in any form. The Trust has adopted an anti-harassment and bullying policy which addresses these issues in more detail. This policy aims to prohibit harassment and bullying within the Trust and covers both employees and Trustees. Copies of the policy are available from the Chief Operating Officer or the Head of Academy.

### **Appointment of Staff**

- 8.2 It is unlawful for appointments to be made on the basis of anything other than the ability of the candidate to undertake the duties of the post. Employees involved in making appointments should do everything possible to ensure that these are made on the basis of merit and in accordance with the prevailing Trust's policy on Recruitment and Selection and regulations on safer recruitment.
- 8.3 In order to avoid any possible accusation of bias, employees must not become involved in any appointment or any other decision relating to the discipline, promotion, pay or conditions of another employee, or prospective employee, if they are a relative of an applicant, or have a close personal relationship with him or her, nor where they have the opportunity to benefit, directly or indirectly, from an appointment without the express prior approval of the Chief Operating Officer of the relevant Head of Academy.
- 8.4 In this paragraph 'relative' means a spouse, partner, parent, parent-in-law, son, daughter, stepson, stepdaughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse or partner of any of the preceding person.
- 8.5 'Partner' means a member of a couple who live together or who are involved in a romantic relationship.
- 8.6 'Close personal relationship' would include a person not employed by the Trust with whom an employee has a close business connection.
- 8.7 Personal relationships between colleagues who work together can give rise to conflicts of interest. Therefore, employees who have entered into a close personal or romantic relationship with a colleague are required to disclose this fact to their Head of Academy. Any information declared or disclosed should be recorded on both employees' personal files and treated in strict confidence.
- 8.8 This information should only be considered to ensure that the existence of the relationship does not impact on the smooth running of the Trust.

## **The Local Community and Service Users**

- 8.9 Employees should always remember their responsibilities to the community they serve and ensure courteous, efficient service delivery to that community in accordance with the policies of the Trust. This may involve dealing with troubled, angry and frustrated parents and carers, although employees are entitled not to be expected to place their personal health, safety and welfare at risk.

### **Contractors**

- 8.10 All relationships of a business or personal nature with external contractors or suppliers, or potential contractors or suppliers, must be declared to the Head of Academy at the earliest opportunity.
- 8.11 Orders and contracts must be awarded in accordance with the Trust's Finance Policy and Financial Manual and no special favour should be shown to businesses run by, for example, friends, partners or relatives.

## **9. OUTSIDE COMMITMENTS**

- 9.1 The Trust recognises that employees are entitled to their private lives. In general, an employee's choices and action outside of work are not the Trust's concern. However in order to protect both the employee and the Trust there are exceptions to this.

## **10. CONDUCT**

- 10.1 Whether in or outside work, employees must not conduct themselves in any way that creates doubt as to their suitability for their post or brings the Trust into disrepute. This includes conduct which would bring into question their suitability to work with children.
- 10.2 All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.
- 10.3 There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or indicate unsuitability to work with children or young people. Misuse of drugs, alcohol, criminal activity or acts of violence would be examples of such behaviour.
- 10.4 Adults in contact with children and young people should therefore understand and be aware that safe practice also involves using judgement and integrity about behaviours in places other than the work setting including on social media.
- 10.5 The behaviour of an adult's partner or other family members may raise similar concerns and may require careful consideration by the Trust as to whether there may be a potential risk to children and young people in the workplace.

## **11. ADDITIONAL WORK**

- 11.1 Employees are able to take on work in addition to their existing contract of employment, providing it does not conflict with the performance of their duties in the role for which they are employed. In order to assess whether or not there might be a conflict, employees are required to request permission from their Head of Academy before taking any outside employment.
- 11.2 The Trust will not unreasonably stop employees from undertaking additional employment, but this employment must not, in the Trust's view, conflict with or be detrimental to its interests, or weaken public confidence in the conduct of its business.
- 11.3 An employee who wishes to take on additional work must ensure that:
- (a) the additional hours worked do not contravene the Working Time Regulations or otherwise give the Trust cause for concern about health and safety at work. Details of the Working Time Regulations are available from the Chief Operating Officer;
  - (b) the outside work does not place the employee in a position where their duties and private interests conflict; and
  - (c) the outside work does not damage, or potentially damage, public confidence in the Trust's conduct or business.

## **12. ADDITIONAL WORK (INTERNAL)**

- 12.1 Employees must not undertake private or personal work, paid or unpaid, of any description in working hours or on academies' premises unless they have been given specific permission by the Head of Academy. Where approval is given any payments will be made in accordance with the Trust Pay Policy.

## **13. REFUSAL OF A REQUEST TO TAKE ON ADDITIONAL WORK**

- 13.1 If an employee has their request to take on additional work refused and wishes to challenge this, they should speak to their Head of Academy or consider raising a grievance under the Trust's grievance procedure.

## **14. BOOKS, TRAINING MATERIALS AND INTELLECTUAL PROPERTY RIGHTS**

- 14.1 If an employee writes a book or creates resources, for payment, on subjects relating to their work for the Trust they must seek the permission of the Trust in writing through the Head of Academy.
- 14.2 The Trust retains intellectual property rights for work undertaken by employees. Research, reports, designs, drawings, software and other developments or similar work, when created in the course of an employee's normal duties, remain the property of the Trust. These should not be removed from academy premises or passed on to third parties by any employee acting in a private capacity without the express consent of the Head of Academy.

## **15. PATENTS AND INVENTIONS**

- 15.1 Any matter, or thing capable of being patented under the Patents Act 1977, made, developed or discovered by an employee, either alone or with others, whilst in the

performance of their duties should be disclosed to the Trust through the Head of Academy and, subject to the provisions of the Patents Act, it will belong to and be the absolute property of the Trust.

## **16. COMPUTER USE**

16.1 The Trust wants employees to use computers to the full and to feel competent and comfortable about doing so. However, it is essential that computers are used appropriately. Any reference to computers should be taken to mean all computer equipment and any associated technology.

## **17. MISUSE OF COMPUTERS/ DIGITAL MEDIA**

17.1 The misuse of computers is a serious matter and may result in employees being subject to disciplinary and, where appropriate, legal action.

17.2 Guidance documents exist within the Trust in relation to the use of computers and information technology. Employees must be familiar with, and abide by, the Trust's Policy on computer use.

17.3 Private use of academies' facilities, such as computers (including use of the Internet), is governed by these documents. Employees should not arrange to receive correspondence and telephone calls in the Trust related to outside work or private interests.

17.4 An employee who is aware or suspects that abuse of computers, email or the internet is taking place is under a duty to report this immediately under the Trust Confidential Reporting Policy (see paragraph 6 above).

17.5 The Trust will monitor the use of computers etc without notice. A record of any sites accessed by staff is automatically stored on the system and may be examined later if misuse is suspected.

17.6 In accordance with Safeguarding guidelines staff must not take images of any injuries sustained by pupils, either within or outside of school hours, and must not make audio recordings of pupil disclosures.

## **18. USE OF SOCIAL NETWORKING SITES**

18.1 The growing popularity of personal web logs (blogs), twitter and social networking sites, such as Facebook, Instagram, Snapchat etc, may raise issues for the Trust, particularly where employees choose to write about their work and the Trust in which they are employed.

18.2 Employees should ensure that the content of their blogs/social networking sites does not bring the Trust into disrepute or breach their obligations in relation to confidentiality and appropriate behaviour.

18.3 Employees should not access personal blogs/social networking sites during working hours. When accessing such sites outside working hours employees are advised not to write about their work or make reference to the Trust on external web pages. Where an employee chooses to do so he/she should make it clear that the views expressed are his/hers only and do not reflect the views of the Trust. In addition employees must

adhere to the rules below.

#### 18.4 Employees must not:

- Disclose or discuss any information that is confidential to the Trust or any third party or any personal data or information about any individual/colleague/pupil/parent which could be in breach of the General Data Protection Regulation;
- Disclose any information which is not yet in the public arena;
- Post illegal material, e.g. material which incites racial hatred;
- Link their own blogs/personal web pages to the Trust's website;
- Include any information, sourced from the Trust, which breaches copyright;
- Make defamatory remarks about the Trust, colleagues, Trustees, pupils and parents;
- Publish any material or comment that could undermine public confidence in the individual as an employee of the Trust or in their position of trust within the community; and/or
- Misrepresent the Trust, by posting false or inaccurate statements about the work of the Trust.

### **19 PERSONAL INTERESTS**

- 19.1 Employees may have a variety of personal interests, which may from time to time impact on their role for the Trust. To protect the Trust and the employee from any accusations of wrong doing the Trust has in place a number of safeguards which demonstrate that these interests are not allowed to influence the way the Trust conducts its business.
- 19.2 Whatever an employee's role within the organisation, they must declare to their Head of Academy, any financial or non-financial interests which could bring about conflict with the Trust's interests. This could include Trustees.
- 19.3 If employees are in any doubt about a potential conflict of interest, they should bring the matter to the attention of their Head of Academy so that a decision can be made as how best to proceed.
- 19.4 Employees must not make, or become involved with, any official or professional decisions about matters in which they have a personal interest.
- 19.5 The Trust is required to establish systems of control to ensure that any business or personal interest by key members of staff and Trustees are recorded.

### **20. GIFTS AND HOSPITALITY**

- 20.1 A potential source of conflict between public and private interests is the offer of gifts, hospitality or benefits in kind to employees in connection with their official duties. It is important to avoid any suggestion of improper influence.

## **21. GIFTS GENERALLY**

- 21.1 Casual gifts offered to employees by contractors, organisations, firms, parents and carers or individuals such as calendars, diaries, pens, food, drink, flowers and other small gifts need not be declared. The general rule is that a gift below the value of £25 does not need to be declared. However, it will not be appropriate to accept a gift below that value if it is given regularly and/or may be perceived as an inducement.
- 21.2 Employees should decline any personal gift offered to them, or to a member of their family, with a value of £25 or over by any person or organisation having dealings with the Trust.
- 21.3 When a gift needs to be refused, this should be done with tact and courtesy, because the offer of gifts is common custom and practice in the commercial world, particularly at Christmas time. If the gift is simply delivered to the Trust, there may be a problem returning it, in which case it should be reported immediately to the Head of Academy.
- 21.4 A checklist is provided at Annex B which should be used to help employees decide whether or not it is appropriate to accept a gift.
- 21.5 The Trust Business Manager will keep a record of all gifts given to employees or the Trust where the value exceeds £25 or when a gift was declined.

## **22. HOSPITALITY**

- 22.1 Offers of hospitality are a normal part of the courtesies of business life but in the publicly funded sector it is important for employees to avoid creating an appearance of improper influence, thus undermining public confidence.
- 22.2 Hospitality is sometimes offered to representatives of the Trust in an official or formal capacity. Hospitality can take many forms and could include attending exhibitions, seminars, sporting events, shows or concerts. Training events with very low training content and free catering, drink or transport may also be hospitality.
- 22.3 Employees need to exercise discretion when accepting offers of hospitality particularly when the host is seeking to do business with the Trust or who may stand to benefit in some way from dealing with the Trust.
- 22.4 Offers of hospitality should only be accepted where there is a clear benefit to the Trust in doing so e.g. networking, building contacts. If there is no or limited benefit employees should not attend.
- 22.5 Hospitality offered by charitable or social organisations, usually in connection with an invitation to speak to the body, can be accepted.
- 22.6 All offers of hospitality should be reported to the Head of Academy, Chief Executive or Chief Operating Officer before it is accepted. The Trust Business Manager will keep a record of all hospitality accepted by employees of the Trust.

## **23. SPONSORSHIP – GIVING AND RECEIVING**

- 23.1 When an outside organisation wishes to sponsor or is seeking to sponsor an academy 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.

- 23.2 Where the Trust wishes to sponsor an event or services, neither an employee, nor any partner, spouse, or relative must benefit from such sponsorship in a direct way without there being full prior disclosure to the Head of Academy of any such interest. Similarly, where the Trust through sponsorship, grant aid, financial or other means, gives support in the community, employees should ensure that impartial advice is given and that there is no conflict of interest involved.

## **24. EQUALITY**

- 24.1 All members of the local community, parents and carers, and other academy employees have a right to be treated with fairness and equity. Employees should become familiar with and observe all academy's policies relating to equality issues in addition to the requirements of the law.

## **25. TENDER PROCEDURES**

- 25.1 Employees should exercise fairness and impartiality when dealing with all customers, contractors and subcontractors.
- 25.2 Employees responsible for engaging or supervising contractors and who have previously had, or currently have, a relationship in a private or domestic capacity with a particular contractor, must declare that relationship to their Head of Academy.
- 25.3 If employees become privy to confidential information on tenders or costs relating to external contractors, they must not disclose that information to any unauthorised person or organisation.
- 25.4 All employees must ensure that no special favour is shown to current, or recent former, employees or their partners, close relatives or associates in awarding contracts to businesses run by them or employing them in any capacity.

## **26. CORRUPTION**

- 26.1 The Trust takes a very firm stance against all forms of bribery and corruption and has adopted an Anti-Fraud and Corruption Policy.
- 26.2 Employees must be aware that bribing another person or receiving a bribe are serious criminal offences under the Bribery Act 2010. Penalties include fines and or imprisonment for up to 10 years.
- 26.3 The offence of 'bribing another person' will be committed if you offer, promise or give financial or other advantage to another person with the aim of inducing or rewarding them perform an activity or function improperly. The activity or function could relate to an external business or commercial activity or any public function (for instance done in house or by another public sector body).
- 26.4 The offence of 'being bribed' will be committed if you request or agree to receive or accept any financial or other advantage in return for improperly performing or allowing the improper performance of an activity or function. The activity or function could be any public function or something you do during the course of your employment.

- 26.5 Further details of the Bribery Act offences are set out in the Anti-Fraud and Corruption Policy.
- 26.6 For your own protection, if anyone makes an approach to you which seems to you, or might seem to a third party, to be aimed at obtaining some form of preferential treatment, or in any suspicious circumstances in connection with a contract, you must report the matter to your Head of Academy or in respect of the Head of Academy, the Chief Executive, Chief Operating Officer or Board of Trustees.

## **27. FINANCIAL PROCEDURE RULES**

- 27.1 All employees involved in financial activities and transactions on behalf of the Trust, including budgetary control, operation of bank accounts, payments of accounts, payments of salaries and wages, petty cash and orders of works, goods or services must follow the Academies Financial Procedures Rules (see Financial Procedures Manual).
- 27.2 Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner and strive to ensure value for money.

## **28. MEDICAL NEEDS AND MEDICATION**

- 28.1 Employees who have medical conditions that require that medication is brought in to school must ensure that it is locked away in an area that is not accessible to young people.
- 28.2 Employees must ensure that the SLT know about any medical condition that may require emergency treatment in case of emergency.
- 28.3 Employees who have chronic or ongoing medical needs such as Multiple sclerosis, arthritis, lupus etc should ensure that they ask the employer for an Occupational Health appointment to keep them safe at work.

## **CODE OF CONDUCT: TRUSTEES**

### **Trustee conduct is underpinned by the following key principles:**

- to act in the best interests of the Trust - this may require balancing short and long term issues, academy and community issues etc.
- to work as a member of a team at all times and be loyal to collective decisions.
- to recognise that all Trustees have the same rights and responsibilities unless particular responsibilities are conferred on them by the full Board of Trustees.
- to understand that no Trustee can act alone except in exceptional circumstances prescribed in the regulations - the power of the Board of Trustees rests in it acting as a single body.

### **And that Trustees must:**

- respect confidentiality.
- listen to and respect the views of others.
- express their own views clearly and succinctly.
- take their fair share of work/positions of responsibility.
- know, understand and work within the prescribed regulatory framework.
- report any evidence of fraud, corruption or misconduct to an appropriate person or Authority.

### **And should always:**

- prepare for meetings by reading papers beforehand.
- attend training and take responsibility for their own learning & development as a Trustee.
- attend meetings promptly, regularly, and for the full time.

## GIFTS AND HOSPITALITY

### Checklist for considering whether to accept a gift or hospitality

The question in all cases is one of judgement, and the following checklist of queries should help employees to decide whether a gift or an offer of hospitality should be accepted or declined.

- (a) Is the value of the gift or hospitality £25 or over?
- (b) If under £25 is it intended as an inducement?
- (c) Is the extent of the hospitality, or nature of the gift reasonable and appropriate?
- (d) Does the donor have any form of contractual relationship with the Trust, does it provide goods or services to the Trust of any kind?
- (e) Is the invitation/gift directed to a large group of unrelated individuals or open to the public, or has an individual been targeted because of their employment with the Trust and the nature of their role?
- (f) What is thought to be the motivation behind the invitation/gift?
- (g) For hospitality does the employee wish to attend if so why? Is it because there will be genuine benefits to the Trust in terms of networking and contacts gained? Or is a desire to attend centred around personal enjoyment?
- (h) Would acceptance of the invitation be, in any way, inappropriate or place the employee under pressure in relation to any current or future matter involving the Trust?
- (i) For gifts is there a difficulty in returning the gift? If it would cause offence can the gift be given to charity?

If an employee decides to accept a gift over £25 they must declare this to their Head of Academy. If an employee declines a gift of over £25 the Head of Academy should also be informed and the reasons for the gift being declined should be recorded.