Winterbourne Nursery and Infant School

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# WINTERBOURNE NURSERY AND INFANT SCHOOL

# Code of Conduct

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| **Approved by:** | Petra Wigzell / Governors<br>( Head teacher) | **Date:** September 2026 |
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# CODE OF CONDUCT FOR SCHOOL BASED STAFF

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# Code of conduct for school based staff

## 1. Scope and purpose

This code of conduct sets out the School's requirements of its employees. However, all those carrying out work for or on behalf of the School, including governors, temporary workers, interim staff, consultants, business partners and contractors are also required to adhere to the principles of the code. Councillors are covered by their own Code of Conduct.

The code of conduct is intended to ensure that all those working for the School are aware of standards expected of them and/or the School, 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 read in conjunction with the Guidance to Schools relating to acceptable use of school monies and the seven principles of Public Life, known as the Nolan Principles (See Appendix 5).

Governors are expected to observe the requirements of the Governing Body Code of Practice in addition to the 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 School'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 School may be referred to their employer and they may be stopped from working for the School with immediate effect. The School 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.

Breaches of the code by Governors will be dealt with in accordance with the Governance Regulations and advice sought from Governor Services.

***Please note that throughout this procedure the Head Teacher is defined as the officer to be notified. In cases where the Head Teacher is the "worker" then the person to be notified is the Chair of Governors.***

## 2. Expectations

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

Everyone working for the School:

- ✓ is using School money and resources in their delivery or support of services to the School community

- ✓ must display high standards of behaviour and conduct to instil public confidence in the integrity of the School 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 School duties
- ✓ is expected to behave in a manner, both at and outside of work, that will not bring the School's reputation into disrepute.

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

2.2. 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. The School 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 School, or which has the potential to bring the School 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.

2.3. 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 judgment 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.

2.4. The Governing Body are responsible for overseeing this code: the code of conduct is available on the 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 School.

## 3. Respect for others

Workers must at all times act with the respect that the public and their colleagues are entitled to expect. To develop and maintain a positive, productive and embracing work environment it is important that colleagues treat each other well.

Workers must treat others professionally and with respect at all times and unlawful discrimination will not tolerated (*see appendix1)*

The school maintains a zero-tolerance policy toward workplace negativity, rumors, and gossiping. Such behaviours undermine morale, fracture professional

relationships, and create a toxic atmosphere that compromises the well-being of the workforce and the wider school community. Staff must address professional differences constructively through established line management structures, rather than through informal or divisive discussions.

## 4. 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.

Any workers who are in a position to influence decisions which taken by, or on behalf of, the School and have any interest in that decision must declare it to Head Teacher. Examples of interests where declarations will be needed include where a worker, their family or household members:

a) Hold a directorship or share holdings in a company which either deal with the School or operate within the borough.

b) Have a relationship in a private/domestic capacity with School colleagues, students, contractors or tenderers (see sections 8 and 14)

c) Receive direct or grant-aided services from the School which the worker is in a position to influence (beyond universal services such as education).

d) Have any significant family or other relationship with governors, clients, contractors or staff working at or with the School or its partners (see sections 8 and14).

e) Have membership of outside groups in the borough or groups receiving aid from the Council (see section 7).

f) Have a non-financial interest within the borough such as a school governor or membership of an NHS trust board.

g) Have an interest in planning or licensing applications; either in terms of submitting an application or in relation to an application for an adjoining or nearby property which they have the potential to influence.

It is the responsibility of workers to notify the Head Teacher, taking account of any changes in circumstances. Failure to do so may result in disciplinary action.

In addition, staff governors and staff with financial responsibilities are expected to make an annual declaration, whether a null one or not, in line with the Council's Scheme for Financing Schools.

## 5. Reporting responsibilities

Like all organisations, we have a way of doing things at the School which we all need to adhere to because of government legislation - or simply because it's the way that the School

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 School's constitution. The governance related advice makes it easy for you to do everything to standard and to escalate if something goes wrong.

5.1. Workers must ensure that they act at all times within their delegated authority as set out within the School's schemes of management and scheme of financial delegation. Workers must not make decisions (financial or non-financial) where they have no delegated authority to do so.

5.2. In addition to declaring interests (as in 4 above) all workers **must** immediately inform the Head Teacher (or Chair of Governors if it is the Head Teacher that is the worker) in writing of all police cautions, warnings, reprimands, arrests and/or convictions received during their period of employment/engagement with the School. 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 workers 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 School's reputation or interests are damaged.

5.3. All workers have a duty to report any suspicion of fraud, theft, corruption, bribery or other wrongdoing by members of the public or School workers including colleagues, managers, governors, contractors, volunteers or partnership workers. Suspicions should be reported to the Head Teacher, the Chair of Governors, or in absolute confidence by following the School's whistleblowing procedure, or in the case of maintained Schools, to the Council's anti fraud team.

5.4. The School will not treat anyone less favourably because they have reported or intend to report wrongdoing, unless the complaint is malicious. 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 employees will be referred to their employer and/or their services stopped.

## 6. Political neutrality and activity

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

6.1. Personal political opinions must not interfere with providing balanced professional advice by/to Managers/Governors. Governors/Workers must not allow their political views to influence service delivery, nor must they impose those views on service users or colleagues.

6.2. Governors/ 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 Teacher/Chair of Governors.

6.3. If a governor or member of staff intends to stand for election as a member of parliament or a Councillor for any authority they should advise their Chair of Governors* in writing. Failure to inform the Chair of governors may lead to disciplinary action being taken, which could result in dismissal.

** If Chair of Governors intends to stand they should inform the Council's Governor Services.*

## 7. 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.

7.1. The school's nominated monitoring officer* will maintain a register of staff and Governors that belong to such organisations: membership must be declared to them.

7.2. Workers and Governors must in particular declare to the monitoring officer membership of any organisation or body which is or could be regarded as being:

a) A secret society
b) Discriminatory (See Appendix 1)
c) in a contractual or potential contractual relationship with the School
d) in receipt of benefit in cash or in kind from the School.

7.3. For the purposes of this code a secret society as mentioned in 7.2 is defined as one that:

a) Is not open to members of the public who are not members of that lodge, chapter, society, gathering, meeting or trust
b) 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.

7.4. 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.

7.5. 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.

*The School has a monitoring officer who maintains a register of staff that belong to such organisations mentioned above and membership must be declared to them. If you are uncertain who the monitoring officer is please ask at the school office.

## 8. Misuse of position

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

8.1. Anyone working for the School must not, either in their professional or personal capacity, use their position improperly to gain an advantage or disadvantage any person or organisation.

8.2. If a worker is in a position to influence any decisions which are taken by, or on behalf of, the School 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.

8.3. 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.

8.4. Workers must ensure that they declare to their Head Teacher 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.

8.5. Workers must not lobby members of the Governing Body or members of the Council on individual or personal employment matters including those associated with recruitment of themselves or others.

(Also see section 15 for standards relating to accepting gifts and hospitality)

## 9. Safeguarding

The School 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.

9.1. When recruiting to posts affording access to children and vulnerable adults managers/Governors must follow the School's procedures to ensure safe recruitment.

9.2. 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.

9.3. 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.

## 10. Finances and the use of School and other public resources

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

10.1. It is a criminal offence to defraud the School 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.

10.2. School facilities may not be used for workers' personal or outside interests without prior agreement. This includes, but is not limited to, funding, buildings, vehicles, furniture, tools, telephone lines and internet connections, ICT equipment. Minimal personal use of low value resources, for example making an occasional short telephone call, is allowed.

10.3. Intellectual property, including research, reports, designs, drawings, software, etc created for work purposes are the property of the School. They should never be removed from the workplace without the permission of the Head Teacher. The only exception to this is when staff take things home in order to work on them, which is permissible so long as the property is returned to the school upon completion of the work.

10.4. All workers have a general responsibility for ensuring that the School's assets under their control are secure and that use of these assets is legal, properly authorised and achieves good value for money. All expenditure incurred should be compliant with the Scheme for Financing Schools, School's Financial Regulations, Financial Procedures, Contracts Handbook and Tenders and Contracts Regulations. Workers must also ensure that they act within the School's Scheme of Financial Delegation and only approve expenditure where they have been delegated the appropriate authority to do so.

## 11. Communications, electronic media and social networking

The School uses a variety of methods to communicate with its workers, students, service users and the community and to deliver services, including external and internal post and telephones, photocopying and printing, fax, email, internet, 'Fronter' or social media. These facilities are provided for School 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.

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

11.2. Any use of social media such as Facebook, Twitter, Linkedin, 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.

11.3. Whether at work or not, workers must not use social media to:

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

11.4. 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 Teacher.

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

## 12. 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 and should familiarise themselves with the School's policies in this regard which are available on request.

12.1. 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.

12.2. 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).

12.3. 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.

12.4. If a worker is unsure whether information can be disclosed they should seek confirmation from the Head Teacher.

12.5. Workers must not transfer confidential information to their private email addresses without the prior knowledge or consent of their manager.

12.6. 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 work places;

- be taken to entertainment or public places, such as cafés, 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.

12.7. Misuse by a worker on leaving the School will be addressed through legal routes.

(Also see section 19 for contact with the media)

## 13. Personal financial affairs, data and pay

13.1. Workers must not conduct their personal financial affairs so that the School or another public body is defrauded or is otherwise denied the income and/or other resources to which it is entitled by law.

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

13.3. Workers should check their pay on every payment occasion, reporting any anomalies to their Head Teacher 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.

13.4. Income tax is a personal responsibility and the School 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.

13.5. It is the personal responsibility of every worker to ensure the School 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 School 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.

## 14. Relationships

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

Personal relationships often develop in the work place and these can cause a number of issues for the School, 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.

**Governors**

14.1. Workers are responsible to the Governing Body through its senior managers. Mutual respect between workers and Governors is essential to good governance. Familiarity must be avoided to ensure the relationship retains a professional balance. Workers must not approach Governors over personal employment issues and doings so may be regarded as an abuse of position as referred to in section 8.

**Contractors and suppliers**

14.2. 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.

14.3. 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 School, should declare that relationship to the monitoring officer as soon as practicable. The monitoring officer should declare any interests to the Head Teacher.

14.4. 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.

**Parents, carers, students (service users) and the community**

14.5. 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 service users, such as borrowing and lending money, giving and receiving monetary or extravagant gifts, sexual intimacy, or showing preferential treatment to service users will be regarded as a misuse of position no matter how well intended. In exceptional circumstances, such as where a pupil 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.

**Work colleagues**

Personal relationships (such as family, intimate or close personal friends) between people in the same team, division or department, or between a line manager and one of their team or other person they may have influence over, are potentially problematic and should be avoided where possible, or managed appropriately where it cannot be avoided.

14.6. 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.

14.7. 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 canvass 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.

14.8. Workers must declare any personal relationships that exist or develop, in the circumstances detailed in 14.7 and 14.8 above, to the monitoring officer.

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

## 15. Gifts and hospitality

To maintain integrity, reduce vulnerability and comply with the Bribery Act 2010 (http://www.bis.gov.uk/anticorruption ) the School will not tolerate any form of bribery by, or of, its workers or anybody acting on behalf of the School.

The School's guidance regarding gifts & hospitality (Appendix 3) should be read in conjunction with this code of conduct as there are strict processes for receiving and rejecting offers of gifts and hospitality. The Head Teacher is responsible for deciding individual cases, in conjunction with the Chair of Governors.

15.1. All gifts (excluding very small gifts with a value of less than £1) and hospitality offered, whether accepted or refused, must recorded on the School's hospitality register.

15.2. It is not permitted for anyone working for the School to receive or give any unauthorised gift, loan, fee, reward or advantage or show favour or disfavour to anyone else, although receipt of end of term gifts may be an exception (Please see Appendix 3, Section c) for further guidance).This applies to workers in their official and personal capacities.

15.3. Workers should not accept personal gifts from contractors and outside suppliers, although items of small value such as pens or business diaries may be accepted, but must be recorded. Only with the express authority of the Chair of Governors should hospitality extend beyond these parameters.

15.4. If returning or refusing a gift would cause offence, Head Teachers can arrange for it to be received by the School on behalf of the Governing Body and pass the gift(s) to them, to be used for fundraising.

15.5. Workers should generally not accept hospitality (e.g. food, drink and business lunches) linked to their employment. In exceptional circumstances and with the prior approval of the Chair of Governors, modest hospitality can be accepted but must be recorded.

15.6. Offers of entertainment (e.g. sports events, theatre tickets and hotel accommodation must not be accepted without the express authority of the Chair of Governors.

15.7. Where an outside organisation wishes to sponsor an activity by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts and hospitality must apply. If there is any doubt between what is and is not acceptable in terms of gifts or hospitality, the offer should be declined.

15.8. Workers providing personal care/support can be particularly vulnerable in this respect. If they are offered any gifts or bequests from students (or students' families) they must inform their Head Teacher. Such items must not be accepted unless the Head Teacher provides prior written approval to do so and should be treated as set out in para.15.3.

15.9. Disregarding the School's processes regarding gifts & hospitality is likely to result in disciplinary action which may lead to dismissal.

## 16. Business Expenses

The environmental and cost impact of different modes of transport must be considered when deciding whether to attend off site meetings.

16.1. School workers are permitted to claim limited reasonable expenses for certain travel and related costs incurred in the course of their employment as detailed in the School's procedures**.**

16.2. Workers are responsible for ensuring that any expenses incurred during the course of their work are kept to a minimum and are authorised in advance unless it is impractical to do so. When travelling by public transport, workers are expected to travel using the cheapest fare available, unless authorised otherwise in advance. Under no circumstances should workers claim for home to work travel.

16.3. The standards relating to expenses apply in the same way irrespective of whether the expenses incurred are funded externally.

16.4. Workers who are provided with mobile phones or PDAs are responsible for identifying and paying for all call charges relating to any personal use of the equipment.

## 17. Alcohol and drugs

17.1. 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.

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

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

17.4. 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 School'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.

17.5. 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.

17.6. 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.

17.7. The Council's drug and alcohol policy aligns with this code of conduct.

## 18. Smoking

18.1 The school recognises that the health, safety and welfare of children, workers, sub-contractors and anyone else directly affected by the school's operations are of prime importance. The school also recognises that employees are often seen as role models to pupils.

18.2 Smoking is therefore strictly prohibited on all parts of the school's premises, including at entrances or anywhere on its grounds. This includes areas that are outside but that form part of the school's premises. Any authorised smoking breaks will be considered part of the employee's (unpaid) break time allocation and deducted accordingly.

18.3 The school does not permit workers to smoke in school vehicles.

**E-Cigarettes/ vaping**

18.4 Although they fall outside the scope of smoke-free legislation, the school prohibits the use of e-cigarettes/vaping in the workplace and the same restrictions on smoking will also apply to e cigarettes/vaping.

The school's rationale for a ban on e-cigarettes is that:

although they do not produce smoke, e-cigarettes/vapes produce a vapour that could provide an annoyance or health risk to other workers;

some e-cigarette models can, particularly from a distance, look like real cigarettes, making a smoking ban difficult to police, and creating an impression for children/visitors/other workers that it is acceptable to smoke.

For further details, please further to the school's smoking policy.

## 19. Additional work

Off duty hours are the personal concern of individual workers but they should not allow their private interests to take priority over their work interest. Workers should not put themselves in a position where their duty and private interests conflict. Private interests in this regard include activities of a voluntary nature as well as business or recreational interests. This does not preclude tuition outside of school hours.

It is not the intention of the School to prevent workers from undertaking additional employment unless that employment conflicts with or detrimentally affects the School's interests, weakens public confidence in the conduct of the School's business, or affects a worker's ability to undertake their work.

19.1. Workers should not undertake outside work related to any matter which is or could be undertaken by the School, without the permission from their Head Teacher.

19.2. A worker who wishes to take on any kind of additional work, paid or unpaid, in any capacity, must ensure that:

a) Where there is a potential conflict of interest for the School they inform their Head Teacher in writing for assessment.

b) their combined working arrangements do not exceed the provisions of the working time regulations for weekly working hours, allow for the daily and weekly rest required by working time regulations or cause other concern in terms of health and safety at work.
c) the work does not place them in a position where their School duties and private interests conflict
d) the work does not damage public confidence in the School's conduct or business
e) the work does not involve being in direct competition with the School for contracts/work
f) any potential employer is made aware that they are already employed by the School.

## 20. Contact with the media

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

20.1. Workers are not allowed to discuss issues with the press or public or disclose information or documents on School business unless expressly authorised to do so by the Head Teacher or the Chair of Governors. 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 Teacher.

20.2. The branch secretaries or corporate staff side leads of the recognised trade unions have specific permission to liaise with the media on behalf of their respective trade unions.

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

20.4. 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.

## 21. Further information

21.1. If you are in any doubt with regard to the provisions of this code and how they apply in any particular situation, you should seek advice from your Head Teacher or the Chair of Governors.

# Standards of behaviour

All School workers are required to be aware of the School'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

The School 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

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.

Any unwanted, unwelcomed and unreciprocated behaviour which undermines a person's dignity/feelings at work is unacceptable to the School. 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 School from another person at work including a customer, 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, cyber attacks/bullying 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.

Cyber attacks/ bullying includes: discriminatory/ libellous emails; social media posts; private messaging; phone calls; the examples are indicative and not exhaustive.
Employees should be encouraged to preserve all evidence of cyber-bullying by saving emails, logging phone calls and taking screen-prints of messages and websites. Much will depend on the identity of the cyber-bully. If it is a fellow employee, employers should conduct an investigation and, if appropriate, take disciplinary action.

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.

There is no definitive explanation of what constitutes offensive behaviour. The effect it has on the recipient is what defines it as offensive. This following list can therefore only be used as a guide to help workers understand what behaviour could be deemed offensive, whether it is intentional or not. The examples are indicative and not exhaustive.

| Type | Description | Examples |
|---|---|---|
| **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 School 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.<br><br>Practicing a religion or belief at work in a way that may cause offence or treats people differently because of their protected characteristic is unacceptable and may | 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.<br><br>Some individuals may be guided by their religion or culture not to shake hands as a greeting. To avoid causing offence individuals should ensure that they greet all people in the workplace in the same way, irrespective of their race, gender, |

| Type | Description | Examples |
|---|---|---|
| | also be unlawful. | age, religion, sexual orientation etc.<br><br>A counsellor declines to provide a service to a same-sex couple on the grounds that such relationships are immoral according to his religion. Such behaviour conflicts with the Council's statutory duty to eliminate discrimination and promote equality and is not acceptable. |
| **Age harassment** | Ridiculing or demeaning behaviour focused towards people because of their age | Mimicking, excluding from social functions/information, making fun of age, questioning ability , setting unrealistic challenges, deliberate body contact |
| **Sexuality harassment** | Behaviour which condemns or ridicules people because of their sexuality | Offensive letters/memos, threats, insults, jokes or comments, personal questions, gestures, starting fights, deliberate body contact, practical jokes, verbal abuse |
| **Harassment related to gender reassignment** | Behaviour which condemns or ridicules people because of their gender reassignment | A transsexual person is subjected to offensive 'banter' at work, relating to her/his gender reassignment. This creates a hostile and offensive atmosphere for her/him, and is likely to be harassment |
| **Bullying/Singling out** | Bullying often results from a misuse of management power, but it can also be the misuse of any form of individual power, such as physical strength, personality or age, or collective power through strength of numbers. More than a strong or authoritarian management style, it is destructive rather than constructive, it is criticism of a person rather than their mistakes, it publicly humiliates rather than privately corrects them and it results in them feeling threatened or compromised. | Ostracising/freezing out, withholding essential information, resources or training, setting impossible tasks, needlessly changing priorities or objectives, unreasonable allocation of duties, deliberate wrongful attribution of blame, shouting, swearing, abuse, nicknames, malicious gossip, public reprimanding or humiliation, belittling or patronising comments, persistent reminders of past failures, unnecessary phone calls to someone's home, hitting or grabbing a person, pushing, jostling, practical jokes, initiation ceremonies, damaging or stealing property. |
| **Victimisation** | Where a person is treated less favourably than another because he/she has brought proceedings, given evidence or information, rejected | A worker helps a colleague with a sexual harassment complaint against another worker. Because of this, their manager marks them down at their annual appraisal on the basis they are 'not very loyal'. |

| Type | Description | Examples |
|---|---|---|
| | advances or complained about the behaviour of someone who has been harassing, discriminating against, or in some other way intimidating them. | |

**How to Complain**

If a worker is personally subject to or witness behaviour which is against the School's standards of behaviour they should discuss this with the person concerned to try to resolve the issue informally. If a worker feels that informal resolution is not possible or appropriate they may raise a formal complaint can be raised via the School's grievance procedure. The complaint will be investigated and disciplinary action taken if the allegation is proven.

If a worker witness's behaviour which is against the School's standards of behaviour they should initially try to resolve the matter informally with the person concerned. If they do not feel that informal resolution is possible or appropriate they should raise the matter with a senior manager such as the Head Teacher.

**Responsibilities**

**It is the School's responsibility to:**

- review, revise and ensure implementation and monitoring of policies and procedures

**It is Governors' responsibility to:**

- support the principles and practice of equality and diversity policies
- ensure that School services are available to all members of the community
- treat all workers and customers with dignity and respect
- ensure the School's commitments are communicated effectively
- ensure that senior management observes its responsibilities in that behaviour towards staff at all levels does not involve any form of harassment or discrimination.
- arrange for provision of specialist advice and training for managers and staff at all levels
- ensure that the School has equalities and diversity policies and set guidelines for the implementation and operation of those policies.

**It is the Head Teachers' responsibility to ensure that:**

- the School's commitment to equalities and diversity is communicated
- that they and their staff comply with the School's standards of behaviour
- all managers apply policies and practices fairly and consistently
- services provided are available to all members of the community
- speedy and appropriate action is taken to deal with offensive behaviour

**It is all workers' responsibility to:**

- understand what the standards of behaviour require of them
- make sure that their own conduct does not cause offence or misunderstanding
- stand up to behaviour that they find unacceptable
- support colleagues who are being harassed, bullied, victimised, or being discriminated against

**It is all managers' responsibility to:**

- treat all workers and customers with dignity and respect and be alert to, and correct, unacceptable behaviour within the workplace
- ensure that all workers and volunteers are aware of the standards of behaviour required of them and know how to raise issues
- support workers if they witness unacceptable behaviour by customers by explaining politely but firmly that such behaviour is unacceptable
- deal with any complaints or allegations which come to their attention appropriately, effectively and confidentially, respecting the rights of all relevant parties
- ensure that complainants are not victimised or retaliated against for complaining

*Appendix 2 – Acceptable standards of appearance*

# Acceptable standards of appearance at work

## Overview

As a representative of the School, a worker's appearance impacts on the School's image. Inappropriate dress can suggest that workers have little regard for their service delivery or their customers; consideration should always be given to public perception.

The School imposes a particular style of dress only where protective clothing and uniforms are required. Whilst there is no desire to impose a style of dress elsewhere, standards appropriate to the effective delivery of our services are necessary.

The School recognises that it employs workers from a wide range of backgrounds, cultures, ages and tastes, who wish to exercise choice in the way they dress. The School accepts that adjustments may sometimes be necessary due to health, cultural or religious considerations.

## Scope

1. This standard applies to all those working for the School (employees, agency and interim staff, consultants, partners, contractors, Governors and volunteers), including those who do not frequently meet the public. Those required to wear uniforms or protective clothing are equally required to comply.

2. It is recognised that conventional business dress may not be appropriate to the School environment. As such, the Governing Body expect the standards outlined below to be maintained by all staff.

3. This standard forms part of the contract of employment so must be adhered to. An inappropriately dressed worker may be sent home to change. Repeated breaches of the standard may lead to disciplinary action being taken. Workers who are sent home to change will be deducted pay for the time taken to do this, subject to the application of the disciplinary procedure.

4. Workers may follow the traditions of their cultural/ethnic/religious background provided they are safe and appropriate to the job.

## Standards of appearance and dress applicable to all workers at all times

- a high standard of cleanliness and personal hygiene
- a standard of dress which promotes the professionalism of the organisation and is appropriate for the work being carried out
- School name/I.D. badge worn visibly at all times, as directed by the Head Teacher.

**Workers who are required to wear uniforms or protective clothing**

- Only uniforms or protective clothing issued by the School may be worn. No substitutes are to be made. Any alterations for religious or health reasons must be agreed with the line manager and must be compatible with the colour and style of the uniform as well as offering the same level of protection.

- It is the duty of each worker to keep all items of their own uniform and protective clothing clean, pressed and in good repair.

- Workers must not allow anyone else to wear their uniform and/or protective clothing and must return all items when they leave the School.

- The uniform/protective clothing must not be worn outside work hours, except when travelling directly to and from work.

- Managers are responsible for ensuring that replacement of uniform/protective clothing is made available when given reasonable notice.

- Breaches are likely to lead to the worker being sent home to change into their correct uniform/collect their protective clothing. This is likely to be unpaid time and disciplinary action will be considered (see also paragraph 3 above)

**Workers who are not required to wear uniforms or protective clothing**

- The standard allows for both formal and informal business dress.

- The choice of formal or informal business dress should be made by each worker according to the requirements of each working day.

- There will be occasions when formal business attire is required for some workers. For example, when meeting visitors/representatives from other organisations. This does not necessarily mean a suit but does mean smart business- attire.

- Suitable footwear is to be worn.

- Whilst the School wishes to be flexible, the following are examples of items which are **not considered acceptable**:

    - shorts or very short skirts/dresses
    - cropped tops which expose the midriff
    - low cut or strappy dresses or tops
    - any clothing bearing political or potentially offensive messages or logos
    - clothing with rips/tears
    - beachwear such as vest tops, flip-flops and shorts
    - jeans, jeggings or denim

  It may be acceptable in some circumstances for casual clothing and/or sportswear to be worn at work, for example:

- staff who are primarily engaged as Sports Instructors or to teach PE.
- staff who are delivering, or assisting in the delivery of, a PE lesson.
- when attending work social events or preparing for accommodation moves/housekeeping.
- when participating in exercise before and/or during the working day, bringing a change of clothing, as appropriate.
- where there is a local agreement that casual clothing and/or sportswear improves accessibility with service users.
- when attending some off site training courses
- where there is a local agreement to allow periodic ‘dress down’ days in the workplace

***If in doubt, check with your manager what is acceptable.***

# GUIDANCE REGARDING GIFTS, HOSPITALITY AND ENTERTAINMENT

The Code of Conduct (the Code) for School staff sets out the standards of conduct expected of School staff in their business activities and in the link between work and their private lives. It incorporates legislation and good practice setting standards of behaviour and integrity for School employees.

These procedures are mandatory and apply to all staff, volunteers, interims and agency staff. The procedures should be read in conjunction with the Code of Conduct and the Council's Anti-Bribery Policy.

**What is a gift, hospitality or entertainment?**

This includes a gift, hospitality or entertainment (including invitations to cultural and sporting events), monetary or otherwise, provided to any School worker (either directly or to a spouse, partner or family member) as a result of them being a School worker. This includes, but is not limited to:

- Goods and other items;
- Services;
- Attendance at cultural, sporting and other events;
- Meals, drinks and other hospitality; and
- Accommodation.

Some exceptions do exist, such as items provided at conferences that are provided to all delegates; **however, where staff are unsure whether an exception may apply, the Code requires that the offer be declined**.

Where clarification is required this should be sought from the School's monitoring officer.

**General steps**

If you are offered gifts, hospitality or entertainment, whether accepted, refused or returned the following steps are required to be taken:

**1) Accept, reject or return the gift and hospitality**

The Code of Conduct states that as a general principle hospitality or entertainment of any sort should not be accepted and that you should not accept **significant** personal gifts.

**a) Entertainment** (e.g. sports events, theatre tickets and hotel accommodation)

This should not be accepted. Any exceptions are likely to be rare and will require the prior express approval of the Chair of Governors, based on the submission of a business case showing a clear benefit to the School.

**b) Hospitality**

The Code of Conduct states that, as a general principle, hospitality should not be accepted. The Code does allow for modest hospitality* to be accepted in two circumstances, namely:

Where the hospitality is funded by a professional or voluntary group and in the latter case is part of the life of the community

Where there is an existing business relationship with a contractor and a modest business or working meal is offered as part of that relationship.

Where hospitality is accepted this should wherever possible be approved in advance by your Chair of Governors and should be recorded within the Hospitality Register.

**For the purposes of the Code it is considered that hospitality of **less than £35 per head in value** could be considered modest. This limit might be exceeded at awards ceremonies, conferences or similar public sector events which should be attended only with prior approval of your Chair of Governors and where relevant to School business. Such cases must still be recorded in the register whether accepted or not.*

Only with the express written authority of the Chair of Governors should hospitality go beyond this and great care should be taken that no hospitality is accepted when purchasing decisions are under consideration.

**c) Gifts**

The Code states that you should not accept significant personal gifts. Gifts of alcohol should not be accepted except in the circumstances detailed below regarding the end of term.

The exception to this is at the end of term, when it is recognised that it is common for parents/carers/students to give gifts to staff, as a sign of appreciation. In these circumstances a gift of alcohol (e.g. a bottle of wine) may be accepted but must be recorded in the Hospitality Register and should only be consumed in circumstances compliant with 17.3 of the code of conduct.

Items of small value, considered for the purposes of the Code to be of **less than £10 estimated retail value**, may be accepted (including those which incorporate the supplier's logo in some form or another) but must be recorded in the Hospitality Register.

**Collective gifts** - These can occur when a person is unwell, reaches a particular milestone, or is leaving the school. In such circumstances the retail value of a gift may exceed the limits defined in this Code but must be recorded in the Gift Register as a collective gift.

Exceptionally, if returning a gift would cause offence, your Head Teacher can arrange for it to be received by the School and passed to the Governing Body, to be used for fundraising.

For these purposes, 'Gifts' and their value limits **do not** include tickets to events. These are considered to be Entertainment as described in 1a) above.

Where items are returned it is good practice to make a proper record of the date and method of return.

**2) Record the item within the School's Hospitality Register**

The Code requires that the School keep records of all gifts*, hospitality and entertainment offered - **whether accepted or refused** - in a Register and that staff are required to make themselves aware of who is responsible for maintaining the Register. Staff must report all offers of gifts, hospitality or entertainment made to them so that they can be included on the Register.

In order to record the item within the register, staff should complete the 'Record of Gifts, Hospitality & Entertainment Offered and/or Received' pro-forma (or record all the required information in an e-mail) and submit this to the officer responsible for the School's Hospitality Register.

All of the required information must be provided, including the business reason for any acceptance. The business outcome achieved must also be recorded, but this can only be done retrospectively. After approval by your Head Teacher this form can be submitted electronically or in paper copy to the person maintaining the register. This should be submitted in advance if possible and if not, within one week of the offer being made.

Where multiple offers of gifts, hospitality or entertainment are made, these should all be recorded. The record should clearly identify each separate offer and the dates of these offers.

* *As previous stated, very small gifts with a value of less than £1 do not need to be recorded on the School's gift/hospitality register.*

**3) Obtain the relevant approval**

Before anything is accepted it must be appropriately approved. In most instances approval by your Head Teacher is acceptable; however, in certain instances express approval from the Chair of Governors is necessary, e.g. where the staff member in receipt of an offer of entertainment is a member of the Senior Leadership Team. The Chair of Governors should consult the relevant committee of the Governing Body before accepting any entertainment for him/herself.

**Please Note -** Where gifts and hospitality are returned or refused staff are still required to enter the relevant details in the Register even though approval has not been necessary.

**Other issues**

i) Maintenance of the Hospitality Register

A designated officer of the school will maintain the Hospitality Register for your School. In order to ensure compliance with the data protection regulations and to protect the identities of officers making declarations the Register is required to be securely held.

ii) Review of the Register – The Gifts and Hospitality Register must be reviewed by the relevant committee of the Governing Body, at least every term. This review should be evidenced by a signature and should be dated.

The Register will be available for inspection by auditors and authorised officers of the local authority.

iii) Whistle Blowing Policy – Where staff are aware of instances where gifts, hospitality or entertainment have been accepted, which they feel should not have been, or do not think have been, appropriately declared, they have a responsibility to notify these concerns via their own manager or using the School's Whistle Blowing Policy.

iv) Failure to follow the guidance set out above may result in action being taken under the School's Disciplinary Code.

**CODE OF CONDUCT FOR SCHOOL STAFF**

**RECORD OF GIFTS, HOSPITALITY & ENTERTAINMENT**

**OFFERED AND/OR RECEIVED.**

**WINTERBOURNE NURSERY & INFANT SCHOOL**

Name of Officer……

Job Title: ……

Name of Business/Person Offering Gift/Hospitality/Entertainment:

……

| | |
|---|---|
| Gift / Hospitality offered | |
| Reason for the offer where known | |
| Offered by | |
| Offered to (Employee name, job title) | |
| Date of offer | |
| Was the Gift / Hospitality accepted or refused? | |
| Business reason for acceptance | |
| Business outcome achieved (this will need to be provided afterwards) | |
| Estimated value (£) | |
| Reason for refusal | |

Officer's signature: …… Date ……

Signature of Head Teacher/Chair of Governors: ……..……

**All School employees are required to complete the following declaration that they have read and understood the code of conduct, including appendices.**

## Declaration

I acknowledge receipt of the School's Code of Conduct, including the appendices which relate to Standards of Behaviour and Acceptable Standards of Appearance.

I have read all three documents and understand:

- the behaviour expected of me whilst I work for the School
- the action I should take if I become aware or suspect any breach by another worker
- that any breach by me could lead to disciplinary action being taken against me, which could result in me being dismissed from my employment.

Print name: ……..

Signature: ……

Employee number: …….

Date: ……

Please return to:

School Office

This document will be retained on your personal file.

## 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:

- **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.

- **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.

- **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.

- **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.

- **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.

- **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.

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