

## **Code of Conduct**

**Approved by Directors:**

**June 2025**

**Review date:**

**On-going**

**DIRECTOR LEAD**

### **SCOPE**

This policy and procedures applies to all employees of eCAPH.

This applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, apprentices and volunteers. The policy also relates to job applicants and is relevant to all stages of the employment relationship.

The policy also applies to sexual harassment by third parties.

The policy and procedures do not form part of any employee's contract of employment, and it may be amended at any time following consultation with the recognised trade unions.

### **AIM OF THIS CODE OF CONDUCT**

Employees of eCAPH should ensure that their own behaviour, and the manner in which they conduct themselves with colleagues, pupils, executive board, directors other stakeholders, sets a positive and professional example.

We recognise that the majority of staff members act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This policy forms part of a, direct or indirect, staff member's contract of employment and failure to comply with it, along with the associated policies, may result in disciplinary action being taken, including legal action where this is warranted.

## PROFESSIONAL BEHAVIOUR AND CONDUCT

### What eCAPH Expects of Employees

eCAPH expects employees to:

- Have proper and professional regard for the ethos, policies and practices of eCAPH.
- Take care of themselves and others affected by their activity at events and when visiting schools/academies.
- Cooperate with school leaders in meeting their duties under the relevant regulations.
- Treat colleagues, pupils, executive board, directors other stakeholders with dignity and respect.
- Observe proper boundaries appropriate to their professional position, showing tolerance of and respect for the rights of others.
- Inform the chair of Directors if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- Be aware that professional behaviour and conduct is expected to be extended to events at non-school/academy based locations.
- Be aware that professional behaviour and conduct extends to use of eCAPH devices, internet, technology systems and AI, both online and offline.
- Act appropriately in terms of the views they express – in particular, political views – and the use of eCAPH resources at all times.

eCAPH expects employees NOT to:

- Use foul or abusive language.
- Perpetrate discrimination, bullying, harassment, or intimidation, including physical, sexual and verbal abuse.
- Misuse or misrepresent their position, qualifications, or experience.
- Seek to bring the eCAPH into disrepute.

## APPEARANCE AND DRESS

eCAPH expects that staff will:

- Ensure that their appearance is clean and neat when representing eCAPH.
- Dress in a manner that is appropriate to their role – eCAPH will make reasonable adjustments to uniform expectations to suit disabilities, medical conditions, and religious and cultural beliefs.
- Not wear clothing that could have implications for the health and safety of themselves, or others.
- Remember that they are role models and that their dress and appearance should reflect this.
- Not dress in a way that would cause embarrassment to colleagues, pupils, executive board, directors or other stakeholders.
- Ensure that, if visible, tattoos do not cause offence to others; if tattoos are likely to cause offence, they must be covered up whilst representing eCAPH.
- Ensure that jewellery and piercings are minimal and, in the health and safety interests of themselves or when visiting schools / academies (avoid anything that could catch or be caught by pupils).

## CONDUCT OUTSIDE OF WORK

Staff may undertake work outside of eCAPH, either paid or voluntary, provided that it does not conflict with the interests of eCAPH.

Staff will not engage in outside work which could seriously damage the reputation and standing of eCAPH, the employee's own reputation, or the reputation of other members of eCAPH. Staff will also not engage in outside work at a level which may contravene The Working Time Regulations 1998 or affect an individual's work performance.

Staff committing offences that involve violence, possession or use of illegal drugs, or sexual misconduct is unacceptable, and will result in disciplinary procedures in line with eCAPH's Disciplinary Policy and Procedure.

Staff will not engage in inappropriate use of social network sites which may bring themselves, eCAPH or colleagues into disrepute. This is explored further in the [Acceptable use of technology section of this policy](#).

## SMOKING, E-CIGARETTES, ALCOHOL AND OTHER SUBSTANCES

Staff will not smoke or vape on, or within a [one-mile](#) radius of any school/academy premises and whenever in the sight of pupils, parents or visitors.

Staff will report for work and remain in a condition to perform their duties free from the effects of drugs, alcohol or any other substances that may hinder judgement and cause changes in behaviour; this does not include over-the-counter painkillers such as paracetamol.

## CONFLICTS OF INTEREST

eCAPH is aware that situations may arise where family interests or loyalties conflict with those of eCAPH, however, staff have an obligation to act in the best interests of eCAPH and its' members to avoid situations where there may be a potential conflict of interest.

All staff will be able to demonstrate that they do not have a vested interest in any decision-making or budget spending. All declarations will be submitted in writing to the directors and included on the Declaration of Interest form.

Failure to make a relevant declaration of interests is a serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact eCAPH or trade union.

Any member of staff found to be withholding information about a conflict of interest will be subject to disciplinary action in line with the Disciplinary Policy and Procedure.

Staff and volunteers will be responsible for:

- Declaring any conflicts of interest.
- Acting in accordance with this policy at all times.
- Identifying any conflicts of interest that have not been previously declared.
- Following eCAPH's Whistleblowing Policy where there are concerns that a conflict of interest has not been declared, and an individual might have subsequently benefitted.
- Ensuring that all individuals in a discussion do not have a vested interest in the subject.
- Informing the directors of any relatives who may have a declarable interest.
- Consider whether they need to declare their relationship with any individual where this might cause a conflict with eCAPH activities.

Membership to a trade union or staff representative group does not need to be declared.

### Financial inducements

Staff will:

- Familiarise themselves and comply with eCAPH's financial regulations.
- Declare to the exec board/directors, in writing, any gifts received, with the exception of:
  - Low cost, functional items suitable for business rather than personal use and displaying the supplier's logo – these items may be accepted.
  - Non-excessive gifts offered by schools / academies to express their gratitude, but staff members should always refuse monetary gifts.
  - Hospitality in the form of meals and drinks where it is part of a normal business meeting.
  - Authorised visits to exhibitions, demonstrations, conferences, business meals and social functions in connection with the school's business, which shall be at the school's expense.
- Not accept a personal gift, payment, or other incentive from a business contact – any such gifts should be returned.
- Declare any gift that cannot be returned to the exec board, who will decide how it will be used.
- Only accept offers to specific events after authorisation from the exec board.

## MAINTAINING PROFESSIONAL RELATIONSHIPS WITH PUPILS WHEN VISITING SCHOOLS / ACADEMIES

eCAPH expects that staff and volunteers will:

- Maintain professional boundaries and relationships with pupils at all times when visiting schools /academies, and will consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead to others questioning their actions.
- Ensure that they do not establish social contact with pupils for the purpose of securing a friendship, or to pursue or strengthen a relationship.
- Ensure that they do not develop personal or sexual relationships with pupils: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, pupils.

Staff are aware that they must NOT:

- Discuss personal information with pupils, such as concerning their lifestyle or marital status.
- Correspond in a personal nature through any medium with pupils, e.g. phone calls or text messages.
- Save images, videos or audio recordings of pupils on personal devices.
- Ignore instances of sexual harassment and inappropriate behaviour amongst pupils.
- Invite or allow pupils to visit their home.
- Allow pupils to access staff members' personal devices.
- Be alone with a pupil.
- Enter changing rooms or toilets occupied by pupils, use toilet facilities allocated to pupils, or undress in facilities intended for use by pupils.

Under the Sexual Offences Act 2003, it is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect to that child, even if the relationship is consensual.

Where inappropriate contact is made with pupils, this will be raised with the school / academy headteacher, and handled in line with that school's Child Protection and Safeguarding Policy and Staff Code of Conduct.

### Appropriate language

Staff will be informed that when visiting schools / academies pupils should not be treated as friends. Staff will NOT:

- Use inappropriate names or terms of endearment.
- Allow inappropriate conversations or enquiries of a sexual nature to occur.
- Comment on a pupil's appearance, including personal flattery or criticism.
- Treat pupils disrespectfully or discriminatorily, based upon their perceived or actual protected characteristics.
- Allow or partake in suggestive humour, banter, jokes or innuendos of a sexual nature.
- Use obscene or inappropriate gestures and language.
- Partake in personal conversations, including on the phone, where this may be overheard by pupils.

## DATA PROTECTION AND CONFIDENTIALITY

All staff will be aware of their responsibilities as laid out in the GDPR Policy and in line with the core principles of the UK GDPR and the Data Protection Act 2018.

Staff members will not disclose sensitive information about eCAPH, the schools / academies, its employees, or the LA to other parties. The only exception to this being when the confidential information gives rise to concerns about safeguarding.

Staff members have the right to request access to data that is held about them. Such requests will be made to the directors in writing..

Staff and volunteers will ensure that:

- Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- When sending confidential information staff will always check that the recipient is correct before sending.
- They involve the DPO in all data protection matters closely and in a timely manner.

Before sharing data, all staff will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

eCAPH holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

## PROBITY OF RECORDS

The deliberate falsification of documents, such as references, academic qualifications, or legal documents, is unacceptable. Where a staff member falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.