



# Washwood Heath Multi Academy Trust

## Staff Code of Conduct

Prepared by:	Director of HR in consultation with Heads of Academy, Unions & whole school staff
Applies to:	Employees, volunteers and contractors at WHMAT
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## CODE OF CONDUCT FOR EMPLOYEES

- ANY REFERENCE TO THE CEO IN THIS POLICY ALSO NOW REFERS TO THE DEPUTY CEO

### 1. Purpose

- 1.1 This Code of Conduct (“the Code”) has been ratified by the Board of TrusteesDirectors of Washwood Heath Multi Academy Trust (“WHMAT”) so that employees understand the standards of behaviour expected of them.
- 1.2 Employees should note that this Code is not exhaustive in setting out acceptable and unacceptable standards of conduct, and employees must use common sense by adhering to the basic principles.
- 1.3 This Code does not form part of an employee’s contract of employment and it may be amended by WHMAT at any time in consultation with affected employees.

### 2. Scope

- 2.1 This Code applies to all employees regardless of length of service, including those in their probationary period. Breaches of the Code, without reasonable excuse, may result in disciplinary action, up to and including dismissal.
- 2.2 Volunteers, agency workers and self-employed contractors should also be made aware of this Code, although unlike employees, breaches of the Code will not be managed in line with WHMAT’s Disciplinary Procedure.

### 3. Principles

- 3.1 WHMAT strives to maintain a positive working environment for its employees and a learning environment for its pupils in which honesty, integrity and respect for its stakeholders are constantly reflected in personal behaviour. This includes colleagues, pupils, parents/guardians and the wider community.
- 3.2 Employees are therefore expected to:
- act professionally at all times and to consider the impact that their behaviour may have on others;
  - treat pupils with dignity, building relationships rooted in mutual respect, and at all times, observing proper boundaries appropriate to their role;
  - show a tolerance of and respect for the rights of others;
  - not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance towards those with different faiths and beliefs;
  - promote the belief that all pupils can achieve and be successful through hard work and practice;
  - approach each day with positive intent; and
  - communicate any concerns or request any support through the appropriate channels in an appropriate manner.

### 4. Safeguarding

- 4.1 All employees are responsible for safeguarding children and promoting their welfare in line with the latest version of *Keeping Children Safe in Education*.
- 4.2 To do this, all new and existing employees must fully read, understand and follow WHMAT’s Safeguarding & Child Protection Policy.

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4.3 Employees should not conceal any matter which is their duty to report under the Safeguarding policy. In addition, all employees must cooperate with colleagues and with external agencies (such as LADO and/or Children's Social Care) where necessary.

#### 5. **Professional Boundaries & Relationships**

5.1 Employees at WHMAT are in a position of trust in relation to our pupils. This means that their relationship is not one of equals.

5.2 Employees must ensure that professional boundaries are maintained at all times.

5.3 Employees should be aware that it is not uncommon for pupils to become strongly attached to an employee or to develop an infatuation. If an employee becomes aware of an infatuation, they should discuss it with the Head of Academy immediately (or CEO in case of Head Office staff or Head of Academy) so that they can receive support on the most appropriate way to deal with the situation.

#### 6. **Whistleblowing**

6.1 Employees considering making a disclosure under the Public Interest Disclosure Act should ensure that they read and follow WHMAT's Whistleblowing Policy. Disclosures made will be taken extremely seriously and will be investigated in line with the WHMAT Policy.

6.2 Although WHMAT is now a multi-academy trust and is not maintained by the local authority, employees wishing to raise impartial concerns may notify Birmingham City Council ("the Council") via the following email Address [whistleblowing@birmingham.gov.uk](mailto:whistleblowing@birmingham.gov.uk). Whilst the Council has no legal powers to investigate a disclosure made by academies (except for those in respect of safeguarding issues and special educational needs), it may refer information on to appropriate agencies such as the Department for Education ("[Dfe](#)") or the Education & Skills Funding Agency ("[ESFA](#)") once it has spoken to the whistleblower.

#### 7. **Health & Safety**

7.1 WHMAT places a high priority on providing a safe working and learning environment for all employees, visitors and pupils and will act positively to minimise the incidence of all workplace risks as required by Health and Safety legislation.

7.2 Employees also have a duty to take reasonable care of themselves and to cooperate with management under the Health & Safety at Work Act 1974. In addition, all activities that they carry out should have the highest regard for the health and safety of other employees, pupils, visitors, contractors and the public. This includes reporting any concerns to their line manager.

7.3 Any action or inaction by employees which puts the health and safety of themselves or others at risk, will be viewed seriously, and disciplinary action may be taken. Employees and other individuals may also face criminal prosecution and/or fines for breaches of health and safety legislation.

7.45 In line with WHMAT's Safeguarding Policy & KCSIE 2018, there are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive

physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Departmental advice for schools is available here: <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>.

10.2 WHMAT will not have a 'no contact' policy as this could leave our staff unable to fully support and protect their pupils and students. However, staff should be aware that "reasonable" in these circumstances means "using no more force than is needed". Decisions about the use of "reasonable" force is therefore down to the professional judgment of staff and will depend on individual circumstances.

10.3 When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

10.4 They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

10.5 Our academies will, by planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, will reduce the occurrence of challenging behaviour and the need to use reasonable force.

employees should not use physical restraint against pupils unless they have received suitable Restraint Training, or physical intervention is necessary to protect the child, or another person, from immediate danger. In addition, any inappropriate physical contact or behaviour by an employee, volunteer or visitor towards a pupil must be reported to the Head of Academy without delay.

## **8. Attendance**

8.1 Employees are required to do all that they reasonably can to maximise their attendance at work. This includes arriving on time and working their core hours (support staff) or until the end of the agreed school day, subject to any directed time (Teaching staff).

8.2 Sickness and/or lateness reporting procedures should be followed promptly at all times so that cover arrangements can be made and managers can exercise their duty of care towards employees and pupils.

8.3 Sickness absence will be managed in line with WHMAT's [Sickness Absence Policy](#) ~~Managing Attendance Procedure~~. Other requests for planned or unplanned leave of absence should be dealt with under WHMAT's Special Leave of Absence Procedure. WHMAT appreciates that employees may occasionally be unable to report for duty due to the unforeseen illness of their dependants. However, WHMAT expects employees to have a contingency plan in place wherever possible so that family illness does not become a regular reason for their own absence in the workplace.

## **9. Following Instructions**

9.1 WHMAT expects its employees to follow all reasonable and proper instructions from those supervising or managing their activities and/or work areas unless:

- a) Doing so would present a health and safety risk to them or others;
- b) The instructions being received conflict with "Fundamental British values" as set out in the Prevent Strategy i.e. "democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs";

- c) There is good reason to believe that the instructions are improper, e.g. because they conflict with the safeguarding of children, financial regulations or other aspects of law.
  - d) They do not comply with other WHMAT and/or individual academy Policies & Procedures.
- 9.2 In addition, those giving instructions should be able to justify their instructions and decisions in line with their delegations and authority, and where necessary, respond promptly to questions from managers or affected employees about those instructions.

## **10. Performance**

- 10.1 Managers should do all that they can to set reasonable deadlines
- 10.2 Employees should do all they can to meet deadlines required in line with their job descriptions or performance management targets.
- 10.3 They should also follow all WHMAT and local academy policies and procedures appearing on local and WHMAT websites and strive to develop positive relationships with pupils, parents and other employees. This is outlined further within the performance management systems and WHMAT Policies on appraisal and pay.

## **11. Academic Integrity**

- 11.1 WHMAT strives to maintain the highest academic standards in all the teaching and research that it undertakes.
- 11.2 Employees must not conduct themselves in ways that may undermine the academic standards of its awards or the conduct and dissemination of its research. This includes following local academy policies on marking, plagiarism and exam arrangements (including controlled assessments, data protocols and assessment arrangements as outlined by the Joint Council for Qualifications (“JCQ”) or other appropriate awarding bodies.

## **12. Personal Interest**

- 12.1 Employees should not abuse their position at WHMAT to obtain an advantage for themselves, whether financial or otherwise. Similarly, they should not allow any personal interests that they may have to interfere with their work at WHMAT.
- 12.2 To avoid any doubt or concerns about personal interests, all WHMAT employees will be asked to complete a pecuniary interests form on appointment and will be asked to confirm whether their position on personal interests has changed on an annual basis. In addition, employees should notify their line managers about any personal interests which might compromise their position within WHMAT. If in doubt about whether a declaration should be made or about what should be declared, advice should be sought from HR or an appropriate senior manager.
- 12.3 Examples of personal interests, which should be declared include:
  - a) If an employee’s job could unduly influence decisions on contracts into which WHMAT has entered into or is proposing to enter into;
  - b) Where an employee has a personal or financial interest in any such contracts, either directly or indirectly (for example, through a partner or relative)
  - c) Where an employee holds a position with an external company or organisation, whether paid or unpaid, which may lead to a conflict of interest (for example directorships of companies, serving on bodies such as charities, voluntary groups, governing bodies of other educational establishments)
  - d) If an employee has a close personal relationship or is a family member of a person who has influence over the employee’s employment with WHMAT or whose employment, the employee could influence or control

12.4 Employees should not use their position in WHMAT to promote any one religion, culture or political ideology to pupils. It is the direct responsibility of all employees to uphold “Fundamental British values” i.e. “democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”.

### 13. **Gifts & Hospitality**

13.1 Employees should treat with caution any offer of money, gifts or hospitality, whether from outside or inside WHMAT, which might be interpreted as an attempt to influence their conduct towards pupils, parents or other employees, or influence a decision around the provision of a service or contract. This is because they may be viewed as bribes.

13.2 The Board of [TrusteesDirectors](#) acknowledges that it is traditional for students and/or parents or carers to give gifts as a small token of appreciation or as a thank you to employees at certain times throughout the year. This Code is not designed to stop that practice. Nor is it intended to stop employees receiving small items as unsolicited gifts for use at work e.g. diaries, pens, calendars etc. However, any employee receiving a gift that may have a value greater than £20.00 should inform the Head of Academy (or the CEO in the case of Head Office employees). The Head of Academy (or CEO in the case of Head Office employees) will then decide whether the gift can be accepted by the employee.

13.3 Heads of Academy should maintain a spreadsheet of any gifts authorised for audit purposes and should seek permission from the CEO, and the CEO from the Board of [TrusteesDirectors](#) if gifts offered may have a value of more than £20.

13.4 Employees should make the Head of Academy aware of any student who is giving them gifts on a regular basis, or any pupil, parent or carer who expects something in return for a gift, as this would not be acceptable.

13.5 Employees should also take advice from the Head of Academy (CEO in case of Head Office employees) before making any gifts to external organisations, or to the employees of such organisations, which either provide services to WHMAT or are potential providers of such services. They should recognise that gifts could put themselves and/or the employees of those organisations in a difficult or embarrassing position.

### 14. **Finance and Procurement**

14.1 Academies are independent, state-funded schools, which receive their funding directly from central government. As such, employees must ensure that they use public funds in a responsible and lawful manner. They should strive to ensure value for money for the local community and to avoid legal challenge.

14.2 All employees involved in financial activities and transactions on behalf of WHMAT, including budgetary control, quotes and tenders, purchase orders, petty cash, payment of suppliers, cash handling and banking must follow the WHMAT Financial Regulations Manual (available from the Finance Office in individual academies).

14.3 Finance employees and budget holders are required to read and follow the WHMAT Financial Regulations Manual. All other employees will ensure compliance by following procedures and guidance given by their finance colleagues e.g. raising a purchase requisition or submitting a petty cash claim.

14.4 Employees involved in the awarding of contracts must avoid potential conflicts of interest, and in particular, must not be involved in decisions where they have a connection to the organisation or individual bidding for the work.

### 15. **Equality of Opportunity**



15.1 WHMAT is committed to the promotion and implementation of equal opportunities, both internally and externally.

15.2 One of WHMAT's core values is the promotion of inclusivity and valuing diversity. WHMAT seeks to ensure that the work environment for its employees is supportive, and one where individual respect is shown to all.

15.3 All employees and pupils, regardless of their gender, race, ethnic background, culture, disability, sexual orientation, age, religion, socio-economic status or any other factor will be supported and encouraged to perform to their potential and to receive quality professional development to do so.

15.4 WHMAT expects all of its employees to comply with ~~WHMAT's the Equal~~ Opportunities Policy & the Dignity at Work Policy. In particular, employees are reminded not to behave in a way which may discriminate against others by on the grounds of the "protected characteristics" set out in equality legislation; namely age, disability, gender identity, marriage & civil partnership, pregnancy & maternity, race, religion & belief, sex and/or sexual orientation.

#### 16. Bullying & Harassment

16.1 To secure an environment in which pupils and employees are able to flourish and to achieve their full potential, WHMAT is committed to ensuring that everyone is able to work and to participate in WHMAT life without fear of harassment, bullying or intimidation. The Board of ~~Trustees~~Directors recognises that everyone at WHMAT has a part to play by ensuring that their own behaviour, whether intentional or unintentional, does not constitute bullying or harassment.

16.2 WHMAT will take action against inappropriate behaviour which shows lack of respect for others or which leads people to feel threatened, violated, intimidated or undermined. For further details, please see WHMAT's Dignity at Work Policy & Procedure.

#### 17. Dress & Appearance

17.1 WHMAT does not operate a formal dress code for its employees, other than for those who are provided with a uniform and/or protective clothing. However, all WHMAT employees are role models to our pupils, and how they present themselves is important.

17.2 Employees should be appropriately dressed in work at all times. This means presenting a smart, professional image, and one that reflects sensitivity to pupil and parent perceptions.

17.3 If it is apparent that WHMAT employees are wearing inappropriate clothing, they will be informed by their line managers.

#### 18. Personal Phone Calls

18.1 Employees may use WHMAT phones to make occasional personal calls for essential or emergency matters. However, personal/non-work-related international calls are not permitted without prior authorisation from the Head of Academy (or CEO for Heads of Academy or head office employees).

18.2 Employees who have been issued with a work mobile phone would not normally be required to reimburse WHMAT for private calls/text messages. However, WHMAT reserves the right to do so should it come to light that this facility is being abused.

18.3 Employees are not expected to use their personal mobile phones during contact time with pupils. In addition, use of personal mobiles during working hours (except for during lunch breaks or other agreed breaks) should be limited to essential or emergency matters.

## **19. Smoking**

19.1 Smoking is strictly prohibited on WHMAT's premises, except in designated external areas within individual academies. Designated areas should be agreed by individual Heads of Academy and be away from pupils and members of the general public.

19.2 Employees who go outside of WHMAT premises to smoke are restricted to doing so during their lunch break or other agreed break.

19.3 WHMAT acknowledges that some employees may use electronic cigarettes ("e-cigarettes"), particularly as an aid to giving up smoking (E-cigarettes are battery-powered products that release a visible vapour that contains liquid nicotine that is inhaled by the user).

19.4 Although they fall outside the scope of smoke-free legislation, WHMAT prohibits the use of e-cigarettes in the workplace. WHMAT's rationale for this ban is that:

- a) although they do not produce smoke, e-cigarettes produce a vapour that could provide an annoyance or health risk to other employees;
- b) 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 pupils, visitors, parents and other employees that it is acceptable to smoke within WHMAT premises or buildings.

## **20. Alcohol & Substance Abuse**

20.1 All employees, volunteers, agency workers and contractors are strictly prohibited from consuming alcohol or of being under the influence of other illegal substances during working hours.

20.2 If an employee, volunteer, contractor or agency worker is found to be under the influence of alcohol or illegal substances on WHMAT premises during working hours, they will be sent off site as they will be deemed unfit or unsafe to be at work.

20.3 WHMAT expressly prohibits the use of any illegal drugs (including psychoactive substances, formerly known as "legal highs") or any prescription drugs that have not been prescribed for the user.

20.4 It is a criminal offence to be in possession of, use or distribute an illegal drug, or to produce, supply or possess with intent to supply illegal drugs. If any such incidents take place on WHMAT premises, in WHMAT vehicles or at a WHMAT function, they will be regarded as serious, will be investigated, and may lead to disciplinary action and possible reporting to the police.

20.5 Employees must inform their line manager regarding any prescribed medication that may have an effect on their ability to carry out their work safely and/or to care for or supervise pupils in their care. In these circumstances, the employee and their line manager should agree how and where the medication will be stored so that it is secure and out of reach of pupils at all times.

20.6 Employees suffering from drug or alcohol dependency are encouraged to declare such dependency to their line manager, Head of Academy or to HR. In these circumstances, WHMAT will do all that it reasonably can to signpost employees to appropriate support services.

## **21. Conduct Outside of Work**

21.1 WHMAT does not seek to dictate how employees conduct themselves in their personal lives outside of work. However, employees must not engage in conduct outside of work which could seriously jeopardise the reputation and standing of WHMAT or of other members of the WHMAT community. This includes unlawful, anti-social or other conduct by employees which may have a negative impact on employee roles.

21.2 Employees should be aware that any such conduct (including material on social media or in the press), which has caused or has the potential to cause reputational damage, will be addressed through the WHMAT disciplinary procedure.

21.3 Employees are expected to make their line managers aware immediately of any situations that take place outside of the workplace, which could have a negative impact on their role at WHMAT or have a negative impact on its reputation or standing in the wider community. This is not limited to, but may include relevant disclosures under the Childcare Disqualification Regulations 2009 and/or the Childcare Act 2006 as amended.

## **22. Other Employment**

22.1 The Board of ~~Trustees~~Directors recognises that additional employment such as tutoring or exam board work may bring CPD benefits to its employees, and that it is not uncommon for WHMAT staff to have more than one post in ~~an academy school~~ at the same time. However, employees should inform their Head of Academy (CEO in the case of Heads of Academy or Head Office employees) in writing if their contract of employment with WHMAT is their main employment, and they are undertaking or wish to undertake additional employment outside of WHMAT.

22.2 The Head of Academy (or CEO in the case of Head Office employees) may only refuse permission for other employment where a conflict of interest exists, or the number of hours proposed has implications for their own health and safety or for that of their pupils and/or colleagues.

22.3 Employees should ensure that any additional employment does not conflict with their capacity to fulfil their contract of employment with WHMAT. This includes not using your position in school to tout for additional paid tutoring and/or encourage pupils or their families to pay you to teach. Employees should seek advice from the Head of Academy (or from the CEO in the case of head office staff or heads of academy) if they are unsure.

## **23. Keeping within the law**

23.1 Unlawful or criminal behaviour, at work or outside of work, may lead to disciplinary action, up to and including dismissal.

23.2 Employees must promptly notify their Head of Academy (or CEO in the case of Head Office employees or Heads of Academy) if they are charged with, or convicted of any criminal offence. Heads of Academy should make the CEO aware of the circumstances, and the CEO should discuss such matters with the Board of

Trustees/Directors. All information provided by employees will be dealt with sensitively and be treated as confidential.

- 23.3 Whilst WHMAT understands that a caution is not a criminal conviction, employees should promptly notify their Head of Academy of these, as they need to be declared during Disclosure & Barring checks unless they meet the filtering rules of the Disclosure & Barring Service ("DBS").
- 23.4 If an employee is charged or convicted with a criminal offence, action may be taken under WHMAT's disciplinary procedure regardless of the outcome of any criminal proceedings. Any subsequent disciplinary action will depend on the nature of the offence(s) and the impact on the employee's role and ongoing suitability to work with pupils.
- 23.5 On each occasion, the Head of Academy and/or CEO as appropriate, will consider, with support from HR, whether a) the allegations; b) charges and/or convictions damage public confidence in WHMAT and/or make the employee unsuitable to carry out their duties as post-holders in a position of trust. However, being investigated by the police, receiving a caution or being charged will not automatically mean that an employee's employment is at risk.

23.6 From 31.08.2018, "disqualification by association" no longer applies in academies (now domestic settings only), staff (including those paid, volunteers and on work placements), who work with reception children during the school day, or under the age of 8 before or after the school day (including those in management roles) must ensure that they promptly declare to HR and/or their Heads of Academy if they are disqualified under the Childcare Act 2006. For further guidance, see guidance at <https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>.

23.7 In addition, all staff (not just those working with under 8s) should be mindful that their "relationships and associations" (including online) may have an implication for the safeguarding of pupils at WHMAT and are encouraged not to place themselves in vulnerable positions.

#### **24. Intellectual property & copyright**

- 24.1 All intellectual property rights; namely (copyright, design rights and the right to patent inventions) relating to anything created or invented by employees in the course of their duties automatically belong to WHMAT. Unless otherwise agreed, employees cannot exploit rights to these, without written permission from the CEO.
- 24.2 Heads of Academy may agree to their individual academies collaborating with other schools to create or invent intellectual property, subject to the CEO's approval.
- 24.3 Employees may use and print copies of items which are WHMAT's intellectual property for their personal and non-commercial use only, provided that all copyright notices remain intact. However, they should not share these items with people or organisations outside of WHMAT without the permission of the Head of Academy (or CEO in the case of Head Office employees).
- 24.4 Employees are required to return all WHMAT intellectual property on termination of their employment (including voluntary resignation and/or dismissal).

#### **25. Access to Confidential Information**

25.1 There will be times when individual employees, through their positions as members of committees, recruiters, line managers etc., become aware of confidential information, either about other individuals or in connection with WHMAT's commercial/academic activities.

25.2 Employees are expected to keep such matters confidential and failure to do so, may lead to disciplinary action.

## **26. Data Protection & Confidentiality**

26.1 All employees who are responsible for holding and/or processing information about employees, pupils, and other data subjects for academic, administrative, information sharing and commercial purposes, must comply with the Data Protection Principles which are set out in the Data Protection Act ~~2018~~<sup>1998</sup>, [the General Data Protection Regulation 2016 \(GDPR\)](#), and supporting legislation.

26.2 Employees must ensure that they do not pass on any confidential, personal information received or obtained through their employment to anyone, whether inside or outside of WHMAT, or to any organisation not entitled to that information, and must not use such information for personal advantage.

26.3 If an employee is ever in doubt about what information can or cannot be disclosed, they should speak to the Head of Academy (or to the CEO in the case of Head Office employees). For further information, see WHMAT's [GDPR Data Protection Policy available at www.washwoodmat.com \(policies tab\)](#).

## **27. Internet Usage & Electronic Communications**

27.1 Employees may use WHMAT internet facilities for occasional personal matters provided that this takes place during non-contact time, lunch breaks or other agreed breaks.

27.2 Internet Users must not on any WHMAT system (whether in school or from home or an external location) knowingly display, access, use, extract, store, distribute, print, reveal or otherwise process any kind of image, document or other material which is sexually explicit, or contravenes any other aspect of WHMAT's E-Safety Policy. Any such activity may lead to disciplinary action.

27.3 Employees should apply the same standards to electronic communications (emails, social media etc.) as they do to other forms of communication. Comments, photographs, images or conversations on social networking sites should not bring WHMAT (or individual academies) into disrepute or damage the employee's reputation within WHMAT. They should also be aware that postings which infringe the Equality Act 2010 or are defamatory about WHMAT, individual academies, or their employees, may lead to disciplinary action. For further information please refer to WHMAT's E-Safety Policy.

27.4 All employees should ensure that screens on laptops and computers are securely locked when not in use to prevent access by pupils. Passwords should also be protected and changed in line with individual academy "Acceptable Use" Policies.

## **28. Dealing with the Press**

28.1 Employees must not make comments to the press or other media, including social networking sites, on behalf of WHMAT unless specifically authorised to do so by the Head of Academy or CEO. Where requests for comments are received, they must be passed to the Head of Academy, who will discuss with the CEO.

28.2 Employees should not publish any material which brings or has the potential to bring WHMAT and/or individual academies into disrepute.

## **29. Review**

- 29.1 This Code will be reviewed annually by the [Director of HR in consultation with the Board of Trustees](#)~~Directors in consultation with the Director of HR~~. Changes will be made, where appropriate, to ensure that it is legally compliant and operating effectively across WHMAT.