



Highfield Community Primary School
Staff Code of Conduct
2025

Contents

1. Introduction
2. Standards of Service
3. Political Neutrality
4. Gifts, Hospitality, Sponsorship and Visits
5. Conflicts of Interest
6. Use of Confidential Information
7. Use of Financial Resources

1. Introduction

1.1 This Code incorporates the provisions of the 1994 "Code of Conduct for Local Government Employees" recommended by the Local Authority Associations and the LGMB. The provisions contained in the Council's previous "Standards of Conduct - Guidance for Employees" have been retained and/or modified in this new Code. The Code also acknowledges and adopts the principles and objectives of the anti-corruption legislation, the Bribery Act 2010 ("Act") which came into force on 1 July 2011. Employees should in conducting their duties at all times have regard to the Act and potential obligations and liabilities arising from the Act.

1.2 Paragraph 2 of Part 2 of the handbook of national conditions of service for local authority employees states:-

"Employees will maintain conduct of the highest standard such that public confidence in their integrity is sustained."

1.3 This Code is concerned with the standards of conduct expected of employees in relation to areas for which it is not always easy to lay down guidelines covering every eventuality.

Whilst these areas are somewhat different to the usual range of matters which are considered under the Council's Disciplinary Procedure, it should be noted that breaches of this Code and guidelines which may cause an employee's conduct or integrity to be questioned, may result in action being taken against the employee in accordance with the Disciplinary Procedure. This would apply even where the particular incident which led to the questioning of conduct or integrity occurred completely outside of the work environment. In this connection, employees must be aware that conviction for criminal offences committed outside of the work environment, where the nature of the offence is such that the confidence of the Council or the public in the integrity and character of an employee may be affected, may lead to disciplinary action - including dismissal.

1.4 The guidance in this Code is intended to assist employees to reach the "right" decision in any particular case. If in doubt employees should always seek the advice of more senior members of management before committing themselves to any particular course of action and more particularly, where an employee is concerned that any occurrence or potential action might constitute a breach of this Code, the Act or the requirement to act in good faith, with impartiality and integrity generally. Human Resources and Legal & Corporate Services can also be contacted for advice through the appropriate departmental management channels.

2. Standards of service

Local government employees are expected to give the highest possible standard of service to the public, and where it is part of their duties, to provide balanced and appropriate advice to councillors and fellow employees with impartiality. Employees at all levels, from senior management downwards, are under a duty to discharge their service obligations by acting professionally, impartially and with integrity in all interaction with the public and any third parties. Employees will be expected through the Council's agreed procedures and without fear of recrimination, to

bring to the attention of the appropriate level of management any breach of duty or deficiency in the provision of service. Employees must report to the appropriate manager, any impropriety or breach of procedure.

3. Political neutrality

3.1 Employees serve the Council as a whole. It follows that they must serve all councillors and not just those of the majority group and must ensure that the individual rights of all councillors are respected.

3.2 In circumstances where employees are requested to attend political group meetings, the Chief Executive must be informed as soon as such a request is made and consulted on the appropriate approach. In the event of employees attending such meetings, they must not compromise their political neutrality.

3.3 Employees, whether or not politically restricted, must follow every lawful expressed policy of the Council and must not allow their own personal or political opinions to interfere with their work.

3.4 Political assistants appointed on fixed term contracts in accordance with the Local Government and Housing Act 1989 are exempt from the standards set out in paragraphs 3.1 to 3.3.

4. Gifts, hospitality, sponsorship, visits and other benefits

4.1 It would be wrong to produce an atmosphere in which Council employees refused all invitations for social involvement with persons or bodies who may have had or may seek to have in the future business dealings with the Council. Contacts established on the social plane can be helpful and in the Council's and the public's interests. At the same time it is very easy for such involvement to be misconstrued as providing an opportunity to bring about undue influence and particularly in view of the recent anti-corruption laws, employees should be vigilant in guarding against compromising situations which could give rise to such allegations. .

4.2 The following extract from the Prime Minister's (Wilson) Committee on Local Government Rules of Conduct still provides a useful summary of the general approach which should be followed with regard to gifts and hospitality. Although directed at the time specifically at Councillors it is equally relevant to employees and must be regarded as an integral part of these guidelines.

"Another particular source of conflict between the private and the public interest is the offer of gifts, hospitality or other benefits in kind to councillors in connection with their official duties. A nice exercise of judgement may sometimes be necessary to decide how the public interest, and the Authority's good name, may best be served. A reasonable amount of entertainment is a normal part of the courtesies of public life, and extreme strictness can give unnecessary offence to people and organisations with whom the Authority's relationships should be cordial. But an appearance of improper influence is easily created, and with it encouragement of cynicism about the motives of those who serve in local government."

4.3 Bribery and Corruption

4.3.1 All employees must be aware that it is a serious criminal offence under the Act to give or receive a bribe. A bribe can take many forms but is essentially any inducement or reward which is offered, promised or provided in order to gain any commercial, contractual or personal advantage. Employees will be guilty of committing an offence if they receive or give any gift, loan, fee, reward or any other advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity. A straightforward view is that anything which breaches the duty of impartiality and integrity could give rise to an offence. If an allegation is made, and if, after investigation is found to have substance, it is for the employee to demonstrate that any such reward or advantage has not been corruptly obtained. Such an investigation may extend to a full criminal investigation resulting in criminal charges and conviction.

4.3.2 If an allegation of the kind set out in 4.3.1 is upheld, this is likely to result in disciplinary action leading to dismissal whether or not a criminal conviction ensues.

4.4 Gifts

4.4.1 This paragraph and paragraphs 4.4.2 and 4.4.3 below, are particularly concerned with the subject of gifts, rewards or other offers from organisations or persons who are providing or who seek to provide work, goods or services to the Council, e.g. developers, building contractors, suppliers of goods or equipment and firms able to provide professional or commercial services to the Council or their agents. As already stated, the provision and receipt of gifts and hospitality (see below) is relatively common and not unlawful. However, they will be considered to be bribes if they are given or received with the intention of influencing business decisions. With the exceptions listed below, the employee should refuse any personal gift offered to him or her, or to a member of his or her family by any person or body who has, or seeks to interact or deal with the Council in any manner which would afford that body or individual or someone associated with it an advantage. Any such offer or conduct should be reported to the Group or Strategic Director concerned and, if the offer is made to a Group or Strategic Director, it should be reported to the Chief Executive. Similarly, any employee should refrain from the provision of any such gift to third parties. If it is necessary to offer a gift or reward, prior approval should be sought from management.

4.4.2 Exceptions

(a) A modest gift of a promotional nature given to a wide range of people and not uniquely to the employee. These gifts are usually given at Christmas time and include calendars, diaries, desk sets, flow charts, tape measures, scales and other articles of use in the office or job.

(b) Gifts of a promotional nature on the conclusion of any courtesy visit to a factory or firm of a sort normally given by that firm.

(c) A gift where refusal would cause needless offence and where the gift, reward or benefit is not offered with the intention of seeking a decision, business or any reciprocal advantage from the Council. It should not be assumed that a gift etc is acceptable because it is offered by a party which is not currently involved in dealings with the Council.

Obviously, it is wise to err on the side of caution; an obviously expensive gift should raise a question even if it otherwise falls within one of the above categories.

If the employee has any concern that an offer might constitute a potentially unlawful inducement, the advice of the senior officer should be sought immediately and in all cases where a gift is accepted this should be reported to the Group or Strategic Director.

4.4.3 When a gift has been refused, this should be done with tact. In some cases a gift is simply delivered and there may be a problem over returning it. It is sometimes acceptable to the giver for the gift to be the subject of a raffle and the proceeds placed to a charitable fund, e.g. Mayor's Charity Fund. However, an arrangement of this sort should only be made with a Group or Strategic Director's approval and recorded by letter. In any event, all gifts of alcohol should be donated to the Mayor's Charity Fund.

4.4.4 This paragraph and paragraphs 4.4.5 and 4.4.6 below, are specifically concerned with the subject of gifts which may be offered by individuals to those employees who have a caring role or who provide a "direct personal service" role to such individuals, e.g. Residential Care and Domiciliary Care employees. It is not unusual for residents of old people's homes or old people receiving any form of domiciliary service to wish to express their thanks and gratitude to care employees by offering gifts, money or even by making the employee a beneficiary in their Will.

4.4.5 Obviously this is an area which needs to be handled with great tact and sensitivity by the employee in order (a) to avoid giving needless offence to the individual, and (b) to protect the employee from any suggestion of improper motives or conduct. The general principle must be that gifts or money should be politely and tactfully refused with a proper explanation given as to the reason why. If such refusal does not work and if pressing the issue would, in the opinion of the employee, lead to unnecessary distress, then the gift should be accepted.

4.4.6 On accepting a gift or money, or on being made aware that he or she has been made a beneficiary in an individual's Will, the employee should immediately report the matter to their supervisor or line manager and discuss

it. If necessary, advice should be sought from higher management to help to determine whether it is acceptable for the employee to keep the gift or money or what steps need to be taken in the event of them being named in a Will.

4.5 Hospitality

4.5.1 The guidance set out above under paragraph 4 is generally applicable to offers of hospitality. Hospitality is sometimes offered to representatives of the Council and is accepted at official, i.e. Council level, because that is reasonable in all the circumstances.

4.5.2 As a general rule, it is not acceptable for an employee to accept an offer of hospitality from a third party if it is suspected that the hospitality is offered with the expectation that it will obtain some business advantage for the offeror or that the employee will reciprocate in providing an advantage in return. Where hospitality is offered to individual employees to purely social or sporting functions then permission to attend should be sought from the Group or Strategic Director and will only normally be given when the event is seen as part of the life of the community or where it is in the interest of the Council to be represented or where the Council should be represented. All offers of hospitality should be reported to an employee's immediate line manager.

4.5.3 In general terms, it will often be more acceptable for employees to join in hospitality offered to a group, e.g. a company's golf day for customers, than to accept something unique to themselves, e.g. tickets for a theatre. When a particular person or body has a matter currently in issue with the Council, e.g. an arbitration arising from a contract, then, clearly, common sense dictates that offers of hospitality be refused even if in normal times they would be regarded as acceptable.

4.5.4 Special caution is needed where the host is seeking to do business with the Council or to obtain a decision from it. It is important to avoid any suggestion of improper influence or breach of the employee's duty to act with integrity and impartiality. When hospitality has to be declined those making the offer should be courteously but firmly informed of the procedures and standards operating within the Council.

As guidance, the following examples are given:-

4.5.5 Generally Acceptable

(a) A working lunch of a modest standard provided to allow the parties to continue to discuss business but where of necessity working lunches are taken on a fairly frequent basis with the same company, the employee should reciprocate in kind. The employee must be careful not to claim subsistence unless he or she has actually expended the money claimed on, for example, the purchase of drinks.

(b) Invitation to a Society or Institute Dinner or function, e.g. private consultant or company inviting members of departments which are directly in contact with them on a day to day basis such as Engineers, Architects, Planners.

(c) Invitation to play golf in the company's annual guest fixture.

(d) Invitation to take part in company jubilee or other anniversary celebration.

4.5.6 Generally Unacceptable

(a) Holiday abroad or weekend in any holiday centre.

(b) Offers of hotel accommodation.

(c) Use of company flat or hotel suite.

(d) Tickets for theatres, shows, concerts, sporting events or other similar types of activities other than in the circumstances set out in 4.5.1 and 4.5.2 and where appropriate permission has been obtained.

4.6 Registering Gifts and Hospitality

4.6.1 For the protection of employees and the Council, all offers of significant (in accordance with the guidance above) gifts, rewards and hospitality, both received and offered by an employee and whether accepted or refused, should be entered in the Services' Register or the Group or Strategic Directors' Register as appropriate.

4.6.2 The Register will hold details of the name and job title of the employee concerned, the details of the offer (nature, event, description, value, date), who the offer was made by and who the decision was approved by (if anyone other than the employee concerned).

4.7 Sponsorship

4.7.1 Where an outside organisation wishes to sponsor or is seeking to sponsor a Council activity whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts, rewards or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors and any associated third parties or agents. Sponsors or potential sponsors should be politely informed that such activities are being promoted by the Council and not individual officers.

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

4.8 Visits to Inspect Equipment, Supplies, etc.

Where employees are required to make visits to outside organisations to inspect equipment, supplies or other goods with a view to purchase on behalf of the Council, employees generally should ensure that the Council meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions.

5. Conflicts of interest

5.1 Other ("Outside") Employment

5.1.1 Employees' off-duty hours are their personal concern but they should not subordinate their duty to their private interests or put themselves in a position where their duty and their private interests conflict. The Council will not automatically preclude officers from undertaking additional employment but any such employment must not, in the view of the Council, conflict with or react detrimentally to the Council's interests, or in any way weaken public confidence in the conduct of the Council's business.

5.1.2 Whilst it is not possible to draw up an exhaustive list of those areas of outside employment which are the subject of this section, the following are examples of broad headings which should cover the more usual areas:

(a) Paid or unpaid employment for an individual or organisation for work which is in any way connected with the scope of the employee's official employment with the Council.

(b) Paid or unpaid employment for an individual or organisation for work which is connected with the employee's profession, this includes board membership, chairing and other arrangements with professional institutes etc.

(c) Any other paid or unpaid outside employment which may have the effect of interfering with the efficient discharging of the duties and responsibilities of the employee's primary paid employment with the Council.

5.1.3 In the light of 5.1.1 and 5.1.2 above, the following specific guidance is given:-

(a) Employees at all levels are required to avoid positions of conflict by undertaking outside work. It is considered that a conflict arises when an employee is to be paid by a member of the public or any outside organisation or body for work, which is in any way connected, with the scope of his or her official duties. Such work should not be accepted.

This does not, however, preclude employees from writing articles or giving talks and lectures on subjects connected with their work. See Paragraph 5.1.4 below.

(b) Employees above spinal column point 28 shall devote their whole-time service to the work of the Council and shall not engage in any other business or take up any other additional appointment without the express consent of the Council. Those graded above spinal column point 28, therefore, need specific permission from the Council to undertake outside work even if in their view the work could not possibly conflict with their duty as an employee of the Council through approval of the employment issues committee.

(c) Those graded spinal column point 28 or below who wish to undertake outside employment, which might in any way conflict with the scope of their official duties must obtain the written approval of their Group or Strategic Director, prior to undertaking such employment.

5.1.4 With regard to fees paid to employees in respect of lectures, talks, written articles, election duties, board membership (including chairs) etc., the following conditions will apply.

(a) Employees are permitted to retain all fees and allowances received for acting in any capacity in connection with the conduct of elections undertaken with the prior approval of the Group or Strategic Director or the chief executive in respect of chief officers.

(b) Where employees wish or are asked, to undertake lectures, talks or duties as an examiner or invigilator during working hours they must, of course, seek the prior approval of their Group or Strategic Director or the Chief Executive in respect of chief officers. Employees may be permitted to retain all fees and allowances in respect of such outside duties.

(c) Where employees wish or are asked, to undertake such duties as in (b) above, outside working hours they are strongly advised to notify their Group or Strategic Director in advance or the chief executive in respect of chief officers. Employees will be permitted to retain all fees and allowances in respect of such outside duties. This paragraph also applies to employees who receive a fee for a written article.

(d) Where employees are asked or wish to become members of a board, adopt a role with a professional institution or other organisation then they must seek prior approval of their Group or Strategic Director or the Chief Executive in respect of chief officers. When considering such applications the approving officer will take into account the following factors:

The organisation concerned, prestige for the Council, sharing the knowledge with colleagues, total time from work, ability to learn from the experience, development of contacts that are good for the Council, potential opportunities for funding.

(e) In respect of (b), (c) and (d) above, attention is drawn to Part 6 - Use of Confidential Information - and the advice contained therein about public disclosure of information. In particular, employees should, where appropriate, emphasise that the views being expressed are their own personal views and not necessarily those of the Council.

5.2. Personal Interests

5.2.1 Employees must declare in writing to their Group or Strategic Director or the Chief Executive in respect of chief officers any non-financial interest, which could bring about conflict with the Council's interest.

5.2.2 Employees should declare in writing to their Group or Strategic Director membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about rules or membership or conduct. In the case of Group or Strategic Directors and Deputy Directors such declaration should be made to the Chief Executive. In the event of a Group or Strategic Director being a member of the same organisation as any employee, the Group or Strategic Director should inform the Chief Executive of the employee's membership of that organisation.

5.2.3 Employees must declare in writing to their Group or Strategic Director or the Chief Executive in respect of chief officers any financial interests, which could conflict with the Council's interests. Section 117 of the Local Government Act 1972 requires employees to make a formal declaration about contracts with the Council in which they have a pecuniary interest. It is a criminal offence to fail to comply with this provision.

5.2.4 Employees in certain services can occasionally be placed in a position where, within the normal scope of their duties, they may be faced with the problem of making official, professional decisions about matters in which they have a personal involvement. Examples of such employees and services are Building Control staff in Development and Enterprise; Housing Improvement Grant staff in Development and Enterprise; Development Control staff in Development and Enterprise; Lettings and Area Housing staff in Community Based Services; Domiciliary Care staff in Community Based Services. The following general guidelines are issued for the assistance of employees to avoid possible conflicts of interest.

5.2.5 Employees should not involve themselves or assist in the preparation and/or submission of applications to the Council for planning permission, improvement grants, entry to Council house waiting lists, building regulations approval, etc., except for those applications relating to their own property or themselves or those of their immediate family. This does not, of course, mean that employees should not assist members of the public with applications or discuss applications informally with them, in the normal course of their duties.

5.2.6 Employees preparing or submitting an application in accordance with 5.2.5 above, or having a direct, personal (not necessarily pecuniary) interest in an application by virtue of that application being submitted by or on behalf of a relative or close friend, should inform their Group or Strategic Director or the Chief Executive in respect of chief officers in writing of that interest. In such cases the employee shall not take any part in the processing or determination of the application.

5.2.7 The decision whether or not to declare an interest must, of course, be left to the discretion and good sense of the individual employee. However, a good general guide will be for employees to ask themselves whether their judgement in regard to an application may, or might be said to, be impaired in any way by their relationship to, or friendship with, the applicant or that their employment in the service might be said to influence the determination of the application.

5.2.8 Employees should be aware that, legally, the ownership of intellectual property or copyright created during their employment is vested in the Council unless the Council agrees to the contrary. Employees must therefore not do anything which conflicts with the Council's rights in this regard.

5.3 Relationships

5.3.1 Councillors - Employees are responsible to the Council through its senior managers. For some, their role is to give advice to councillors and senior managers and all are there to carry out the Council's work. Mutual respect between employees and councillors is essential to good local government. Close personal familiarity between employees and individual councillors can damage the relationship and prove embarrassing to other employees and councillors and should therefore be avoided.

5.3.2 The local community and service users - Employees 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 as defined by the Council's policies.

5.3.3 Contractors - All relationships of a business or private nature with external contractors or potential contractors should be made known to the appropriate manager. Orders and contracts must be awarded on merit, by fair competition against other tenders, and no special favour should be shown to anyone in the tendering process. Employees should act impartially, in good faith and with integrity throughout a tendering process and in any relationships/dealings with contractors or their agents. No parts of the local community should be discriminated against.

Employees who engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a relationship in a private or domestic capacity with contractors should refer that relationship to the appropriate manager.

6. Use of confidential information

6.1 Employees shall not communicate to the public proceedings of any committee meeting, etc., nor the contents of any document relating to the Council unless required by law or expressly authorised to do so.

6.2 The following extract from the Prime Minister's (Wilson) Committee on the problems associated with handling confidential information is still valid and must be regarded as an integral part of these guidelines:-

"A conflict of interest can also arise over the use of information which members and employees of local authorities necessarily receive, by virtue of their duties, before it is made public. Such information may be of a kind which the member or employee could use to his own profit. This can arise anywhere in the wide range of functions performed by local authorities, but the risks are especially great in land use planning and in the award of contracts. The basic safeguards against such misuse of information are the general ones mentioned earlier; the honesty of the individual and maximum openness.

For the latter, the Authority must ensure that information in its possession becomes public knowledge at the earliest possible stage, so as to reduce to the minimum the time during which particular information can confer any advantage upon its possessor."

6.3 Employees should not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way. Any particular information received by an employee from a councillor or another employee which is personal to that individual and does not belong to the Council, should not be divulged by the employee without the prior approval of that individual, except where such disclosure is required or sanctioned by the law.

6.4 Nothing is more damaging to the relationship between employees and members of the Council and between the Council and the public than ill considered gossip outside the office about the Council's business.

6.5 Some services deal extensively in matters of a confidential and personal kind and here employees need to be particularly circumspect in what is said outside the service about matters which are going on inside it.

6.6 In all services, however, the following guidelines should be adhered to:-

(a) Official documents - letters, memoranda, committee reports, agendas and minutes, files, plans, etc., should not be taken out of the office except in connection with official Council business or where the employee wishes to do some work away from the office.

(b) Paragraph 6.1 above makes clear the rules governing communication of Council information to the public. The "public" must also be taken to read the "media" and, in the employee's own interest he/she should not talk to the press, television or radio or provide any written information or documents to them without the express consent of his/her Group or Strategic Director. It may be advisable for a Group or Strategic Director to determine that either him/herself or a specific nominated person or persons in his/her service are the only people authorised to communicate with the media.

(c) Employees should not communicate confidential information or the contents of any documents such as those mentioned in 6.6(a) above, to other employees of the Council and any other persons who do not have a legitimate work involvement with the subject to which the information or document relates.

6.7 Employees should be made aware of the implications of the Data Protection Act 1998. Personal data (i.e. consisting of information about a living individual from which that individual can be identified) held on computing equipment,

must not be disclosed to persons or organisations who are not registered as receivers of such information. Contravention of this Act can result in the Data

Protection Registrar taking proceedings for prosecution of offences under the Act.

6.8 The Tendering Process

6.8.1 Employees involved in the tendering process and dealing with contractors should be clear on the Council's policies and procedures for tendering including the respective roles of client and contractor. Employees who have both a client and contractor responsibility must be aware of the need for accountability. It is the employee's duty to remain vigilant in dealings with contractors and their agents to ensure that nothing occurs that might breach this code and the Act itself during the tendering process.

6.8.2 Employees must exercise fairness and impartiality when dealing with all customers (and potential customers), suppliers, other contractors and sub-contractors, business partners and their agents.

6.8.3 Employees who are privy to confidential information on tenders or costs for either internal or external contractors must not disclose that information to any unauthorised party or organisation. The absolute need for confidentiality in handling such information, both within and without the Council, cannot be stressed too highly and employees who breach this confidentiality will be subject to disciplinary procedures.

6.8.4 Employees contemplating a management buyout should immediately inform their Group or Strategic Director or the Chief Executive. They should take no further part in any tender process for any work for which the proposed management buyout might be a competitor.

6.8.5 Employees should ensure that no special favour is shown to anyone in awarding contracts.

7. Use of financial resources

Employees must ensure that they use public funds entrusted to them in a responsible manner.

8. Raising a concern

8.1 Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an employee is unsure what conduct constitutes bribery or corruption or any breach of this code of conduct on which there are any other queries, this should be raised with the employee's line manager in the first instance except where specifically stated otherwise in this document.

8.2 The Council will take all reasonable steps to ensure that no employee suffers detrimental treatment as a result of refusing to take part in bribery or corruption or as a result of reporting a suspicion of bribery or any other breach on this code of conduct.

9. Communicating the Council's Policy to others

The Council's zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, business partners and their agents at the outset of and at appropriate times during the business relationship.