

1. PURPOSE

- 1.1 The purpose of this Code of Conduct is to assist all those working within Indie Education (**Indie**) to understand and comply with expectations in terms of their standard of conduct and behaviour.
- 1.2 Indie aims to provide a high-quality provision for all learners, employees and any external companies with whom we may have business and promote public confidence in the integrity of our organisation.
- 1.3 This Code complies with the requirements of relevant legislation, and reflects Indie Education's Policies and Procedures, as amended.

2. SCOPE

- 2.1 This Code of Conduct applies to all Indie Education employees (including full time, part time, permanent, fixed term and casual), contractors, volunteers, and agency workers.

3. EXPECTATIONS

- 3.1 All employees must:
 - (a) Read this Code of Conduct carefully (and alongside Indie Education's policies and procedures) and seek advice and guidance on any matters that they do not fully understand.
 - (b) Adhere to the principles contained within this Code during the course of their work or when representing Indie Education.
 - (c) Reflect high standards of behaviour both at work and in their private life, setting a good example for learners and others at all times.
 - (d) Be mindful of their behaviour outside the workplace and how it may impact their reputation and the reputation of Indie Education.
 - (e) Ensure that they adhere to the relevant professional standards for their role.
 - (f) Safeguard children's wellbeing and maintain public trust in their profession, as part of their professional duties and in line with relevant professional standards.
- 3.2 Any breaches of this Code may result in a formal investigation being carried out under Indie Education's Disciplinary and Grievance Policy and may result in disciplinary action being taken against the employee.

4. EQUALITY, DIVERSITY & INCLUSION IN THE WORKPLACE

- 4.1 All employees have a personal responsibility in line with Indie Education Equality Strategy to promote equality, diversity and inclusion within Indie Education in respect of their colleagues, trustees, learners, learners' parents and carers and the local community.
- 4.2 Equality: Everyone is treated fairly and with respect regardless of their age, disability, gender reassignment, race, religion/belief, sex, sexual orientation and marriage/civil partnership and

pregnancy and maternity.

4.3 Diversity: Recognise and value diversity of others within the workplace and understand how any differences can benefit others, Indie Education and the local community.

4.4 Inclusion: Recognise each individual's value within Indie Education and the wider community in feeling valued and included.

4.5

5. DIGNITY & RESPECT

5.1 All employees are expected to maintain a high standard of behaviour and personal conduct at all times to ensure that everyone, including trustees, colleagues, learners, parents and carers, are treated with dignity and respect.

5.2 A respectful workplace:

- (a) welcomes all;
- (b) encourages employees to be kind;
- (c) promotes equality of opportunity and treatment of others;
- (d) respects diversity;
- (e) promotes employee health and wellbeing;
- (f) communicates expectations around behaviour and personal conduct;
- (g) strives for improvement and transparency;
- (h) encourages open and honest communication between employees;
- (i) ensures that all disputes at work are dealt with effectively under the relevant policies and procedures.

5.3 All employees must act with personal and professional integrity, respecting others by:

- (a) never using inappropriate or offensive language;
- (b) acting in the best interests of Indie Education and its ethos;
- (c) being honest and acting with integrity;
- (d) treating learners and others with dignity and respect;
- (e) showing tolerance and respect for the rights and beliefs of others;
- (f) acting as a role model for learners by consistently demonstrating high standards of behaviour;
- (g) not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
- (h) not expressing personal beliefs in a way that will overly influence learners, exploits learners' vulnerability or might lead them to break the law;
- (i) conforming with <https://resources.workable.com/equal-opportunity-company-policy> Equal Opportunities legislation in all aspects of their work.

- 5.4 Where an employee believes that they have been unfairly treated they may refer to Indie Education's Grievance & Dignity at Work Policy.

6. SAFEGUARDING

This section should be read in conjunction with the "Guidance for Safer Working Practice for those Working with Children in Education Settings" and KCSIE.

- 6.1 All employees, governors and volunteers will be given a copy of the following documents:
- (a) Indie Education's Child Protection and Safeguarding Policy.
 - (b) KCSIE document part 1.
 - (c) Guidance for Safer Working Practice for those Working with Children in Education Settings.
- 6.2 All employees, governors and volunteers have a duty to safeguard learners to ensure they are not harmed or at risk of harm.
- 6.3 Any concerns about breaches of the KCSIE, unsafe practice or potential failures by Indie Education or its employees **must be reported** to the DCEO/CEO or Designated Safeguarding Lead (DSL) immediately. Concerns in respect of the DCEO should be raised with the CEO. CEO to the chair of the board of Indie Trustees.
- 6.4 All employees will receive appropriate Safeguarding and Child Protection training. If for any reason an employee misses this training, alternative arrangements should be made as soon as possible. All employees will be expected to keep up to date with any changes made to the KCSIE document.
- 6.5 The documents at 6.1.1 must be read and understood and any queries should be directed to the executive leadership team (ELT). Employees are asked to sign a copy of these documents to confirm that they have read and understood these and will agree to abide by them at all times during their employment.
- The Designated Safeguarding Lead/Designated Safeguarding Person is: DCEO 'Sara Marsh'
 - Local Authority Designated Officer contact details: 0116 305 4141.

7. DATA PROTECTION & CONFIDENTIALITY

- 7.1 This section should be read in conjunction with Indie Education's Data Protection Policy, Privacy Policy & IT Acceptable Use Policy.
- 7.2 Employees are privy to confidential and sensitive information about Indie Education, their colleagues, volunteers, learners and their parents and carers. The Data Protection Act 2018 states that anyone who is responsible for using personal data must follow strict data protection principles.
- 7.3 All employees must therefore ensure that any information collected is:
- (a) used fairly, lawfully and transparently;
 - (b) used for specified, explicit purposes;

- (c) used in a way that is proportionate, relevant and limited to only what is necessary;
- (d) accurate and, where necessary, kept up to date;
- (e) kept for no longer than is necessary;
- (f) handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

7.4 Employees must:

- (a) not disclose, or use (directly or indirectly) any information (either about Indie Education business, employees, learners, parents, or external agencies) they receive or allow others to do so whether during their employment or after their termination. Any such data must **only** be accessed by authorised users for legitimate purposes;
- (b) not use data held by Indie Education for any purpose other than that for which it is intended;
- (c) ensure that all data is kept secure (e.g. locked away or protected by password) and that data on screens or within documents are not left within view of others;
- (d) not disclose or display information about logins or passwords for automated devices, or keycodes or similar for manual locks;
- (e) ensure that when sharing personal or sensitive data external to Indie Education, that it is done by secure methods taking care to minimise the risk of loss and making sure it reaches the intended recipient.

7.5 When an employee is in doubt about whether to share information or keep it confidential, they must seek guidance from the DCEO.

7.6 Employees must follow and comply with Indie Education's Data Protection Policy & Privacy Notice at all times. Failure to do so is considered a serious breach.

8. DECLARATION OF INTEREST/CONFLICT

8.1 Indie Education understands and encourages employees to undertake activities outside of work and take an active role in their community. However, employees should avoid any activities that have the potential to cause a practical conflict with their employment, reputational harm to Indie Education or undermine Indie Education's trust and confidence in them.

8.2 If a conflict, or potential conflict, arises during an employee's employment with Indie Education this must be declared to the DCEO who will then consider whether it would be appropriate for the employee to continue with the activity. Where an employee fails to comply with instructions from the DCEO this may be treated as a disciplinary matter (see Disciplinary Policy).

8.3 It is the responsibility of employees to declare any interests or conflicts. Failure to do so may be considered a disciplinary matter. Any concerns or queries regarding interests or potential interests should be discussed with an employee's line manager at the earliest opportunity.

9. GIFTS & HOSPITALITY

- 9.1 This section must be read in conjunction with Indie Education Gifts & Hospitality Policy
- 9.2 Employees should not accept or give any significant gifts or offers of hospitality as this could be perceived as an act of bribery to influence decisions or be construed as favouritism, which could compromise Indie Education. The term “gift” can also include the procurement of services at a lower cost than that charged to the general public.
- 9.3 Employees should notify the DCEO if they receive any gifts of substantial value or significance and, where possible, decline the offer politely and firmly. If in doubt employees should discuss the matter with the DCEO.
- 9.4 Any provision of hospitality that is seen as necessary to represent Indie Education may be accepted with the approval of the DCEO.
- 9.5 Gifts of appreciation such as gifts at Christmas or “Thank You” gifts given at the end of a term, which have no substantial financial value (e.g. less than £25) can be accepted and do not need to be declared to the DCEO.
- 9.6 Under no circumstances should employees accept cash as a gift, even below £25, unless it is cash for donations to charitable funds. Any such donations must be handled in line with the financial procedures.

10. MOBILE PHONES & HANDHELD DEVICES

- 10.1 Personal mobile telephones and handheld devices must not be used:
- (a) during learner sessions/when learning is taking place;
 - (b) when supervising learners outside of the classroom (e.g. at break times/lunch times);
 - (c) at any time when responsible for the health and safety of learners, including whilst off site (e.g. on a College trip).
- 10.2 Employees must not:
- (a) use their personal mobile phone or devices to contact learners or their parent/carers;
 - (b) use their personal mobile phone or devices to take photographs of learners or retain personal information regarding the learners at College;
 - (c) give out their personal phone numbers or contact details, including personal email addresses to learners or their parent/carers;
 - (d) keep inappropriate or illegal content on the device.
- 10.3 Where there is a need to deviate from any of the above (e.g. in an emergency situation) employees must inform the DCEO or CEO immediately or as soon as practically possible.
- 10.4 The above points aim not only to protect learners but also to protect employees from allegations of misconduct or inappropriate behaviour.
- 10.5 Employees bringing a personal mobile phone or hand-held device into college do so at their own

risk. The college will not be held responsible or accept any liability for personal equipment that is lost, stolen or damaged.

11. NOTIFICATIONS OF CONVICTIONS/CAUTIONS

11.1 Employees **must** disclose **any** cautions or convictions:

- (a) prior to or on appointment;
- (b) at any other time during their employment. Where employees receive any new cautions or convictions during their employment at the college this must be disclosed to the CEO. Consideration will be given to how the caution or conviction impacts on an individual's role within college.

11.2 The above also applies to any driving convictions received by prospective and existing employees.

11.3 Indie Education conducts an annual disclosure process, requiring all staff to declare any cautions or convictions when requested. Failure to do so may result in disciplinary action, including dismissal. In some cases, this may constitute grounds for dismissal under statutory requirements (such as legal restrictions on employment) or under *Some Other Substantial Reason (SOSR)*.

12. PERSONAL APPEARANCE AND DRESS CODE

12.1 Health and Safety: Personal Protective Equipment (PPE) must be worn as directed, instructed, or trained and where a risk assessment indicates that it is necessary to control residual risks.

12.2 Religion and Faith: Employees of particular faiths or religions, which are required to wear specific types of clothing will be respected subject to where this may pose a hazard to the health and safety of anyone or where this impacts on teaching and learning.

- Indie Education recognises the diversity of cultures and religions of its employees and will take a sensitive approach when this affects dress requirements.

12.3 Head and Facial Hair: When handling food or where there may be a health and safety risk, employees must ensure their hair is kept neat, tidy, and tied back.

12.4 Tattoos: Any visible tattoos should not be offensive to others. Where they are deemed to be offensive or are of an adult nature they should be covered appropriately

12.5 It is important that all employees ensure that their dress and personal appearance is appropriate for work at all times. Therefore, all employees must:

- (a) be responsible for their general presentation and personal appearance;
- (b) be considerate of and promote a positive image of Indie Education;
- (c) ensure that Indie branded clothing is worn with employee name clearly embroidered, branded clothing is provided by Indie Education and must be worn unless exceptional circumstances which need DCEO approval.
- (d) ensure that clothing and any jewellery worn is appropriate to the role being undertaken;
- (e) it is recognised that some roles will require employees to wear sports clothes, such as those

involved in PE, for these individuals, a variety of branded clothing will be provided to ensure that there is consistency in message throughout Indie Education.

- (f) ensure any non-branded clothing and personal appearance is appropriate and will not cause embarrassment or offence to others. Clothes should be non-offensive and contain no provocative logos or remarks;
- (g) ensure that clothing does not over-expose parts of the body (e.g. stomach or chest) or is transparent. Tight or revealing clothes including mini-skirts, low cut tops or low waistlines are not considered appropriate;
- (h) dresses, skirts and tailored shorts should be of a reasonable length, covering at least half of the thigh;
- (i) Where dresses or skirts are cut to above the knee, tights should be worn;
- (j) ensure that footwear is suitable for the duties undertaken. Strapless sandals or flip-flops which do not provide necessary protection or are considered a health and safety risk should not be worn, unless there is a medical reason for doing so.

12.6 The above list is not exhaustive in defining acceptable and unacceptable standards of dress and appearance and employees should use common sense in adhering to the principles listed above. Indie Education reserves the right to highlight any inappropriate clothing and may require employees to address this matter if necessary.

12.7 There may be times when employees wish to support different charities, for example, Jeans for Genes Day and Christmas Jumper Day. On these occasions employees must seek permission from the DCEO prior to participating and must still be mindful of the principles contained within the code.

12.8 Failure to adhere to Indie Education standard of dress and appearance could constitute misconduct and may result in disciplinary action.

13. PERSONAL CONNECTIONS

13.1 It is recognised that there may be occasions where personal connections exist amongst individuals at work. Where such employees are, or may be, working closely with colleagues with whom they have a personal relationship, they must:

- (a) ensure that any such relationships do not adversely affect their employment or ability to carry out their role;
- (b) protect against bias/unfair advantage or prejudice, particularly where they have supervisory or managerial responsibility over another;
- (c) avoid situations where there is potential for conflict of interest;
- (d) ensure that situations do not develop where other employees feel unable to speak openly and honestly, or feel that a relationship is having an adverse impact on their own employment;

- 13.2 The reason for this is to protect all parties from any accusations of breaches of confidentiality or the abuse of authority or conflict of interest.
- 13.3 A **personal** connection is defined as:
- (a) A family relationship (e.g. Grandparents, siblings, children & grandchildren (including in-laws and step children);
 - (b) A sexual/romantic relationship (e.g. spouses or partners);
 - (c) A business/commercial/financial relationship; or
 - (d) Any other close personal friendship or relationship.
 - (e) NB. This is list not exhaustive.
- 13.4 In line with Indie Education Recruitment & Selection Policy an employee involved in any part of the recruitment process who has a personal connection with an applicant should declare this from the outset. They should also not act as a referee for that person where possible. Such employees must not be involved in the following:
- (a) Recruitment processes;
 - (b) Decisions relating to pay in respect of that individual;
 - (c) Decisions related to or the management of the employee's performance;
 - (d) Any conduct issues that arise that may involve the employee.
- 13.5 Disclosure of a Personal Connection**
- 13.5.1 Employees must disclose in writing to the CEO any personal relationship which develops or ends during the course of employment. If an employee is in doubt as to whether their relationship should be disclosed they should seek advice from the CEO. In these circumstances, any disclosure will be treated fairly and confidentially.

14. PHOTOGRAPHS & RECORDING

- 14.1 Employees must only take photographs/videos of learners and their colleagues for college purposes in accordance with Indie Education's procedures as outlined in the Online Safety Policy & IT Acceptable Use Policy.
- 14.2 Photographs taken for official college use may be covered by the Data Protection Act 2018 or the Keeping children safe in education (KCSIE) document, and learners and employees should be advised of the reasons why any photographs or videos are being taken.
- 14.3 Where images of learners or employees are used for publicity purposes, appropriate consent of the individual concerned, and their parents/carers must be obtained. Images must not be displayed on websites, in publications or in a public place without explicit consent.
- 14.4 Employees taking photos for college purposes must only do so using college equipment.
- 14.5 Personal devices are not to be used at any time.
- 14.6 Employees who are not clear on the use, collection or handling of data, including photography or

recordings, must seek advice either from the CEO. Ignorance regarding Data Protection regulations cannot be used as an excuse for failing to comply with the requirements and will be treated as a serious issue.

15. PROTECTION OF COLLEGE PREMISES/PROPERTY & EQUIPMENT

15.1 Employees are responsible for the safe keeping and the appropriate use of the college premises, property and any equipment belonging to the college that is under their control or in their possession. This includes, but is not limited to:

- (a) College owned documents;
- (b) College Books, including text books, reference books etc;
- (c) Laptops/tablets;
- (d) Mobile phones/hand held devices;
- (e) Office equipment;
- (f) Keys;
- (g) Security passes;
- (h) Credit cards;
- (i) Any other property that may be given to individual employees.

15.2 Employees must:

- (a) take good care of college property and equipment when used both on-site or outside of the college premises;
- (b) ensure that all property and equipment is maintained appropriately in accordance with the college policy;
- (c) take reasonable steps to ensure the security of college property at all times; this includes taking all steps to ensure that the property is not misplaced, lost or stolen, ensuring confidential information cannot be viewed, accessed or copied;
- (d) obtain written permission for use of college property or equipment where this is for non-work purposes, setting out the clear use, purpose and duration;
- (e) not use the Indie Education property or equipment if intoxicated through alcohol consumption or drug taking;
- (f) comply with Health and Safety obligations at all times;
- (g) respect both the college premises and any Indie Education equipment;
- (h) on the termination of their employment, return all Indie Education property.

16. SECONDARY EMPLOYMENT

16.1 Employees may take up additional employment, paid or unpaid, providing it will not create a conflict of interest, cause the reputational harm or adversely affect an employee's ability to carry

out their duties and responsibilities effectively and efficiently.

- 16.2 Paid or unpaid employment includes, but is not limited to:
- (a) taking up employment with any employer on any type of contractual arrangement;
 - (b) running your own business;
 - (c) private tutoring;
 - (d) holding directorships or trusteeships;
 - (e) participating or having any other interest in organisations that may be a competitor or supplier to the college.
- 16.3 Prior permission must be sought from the CEO before taking up any additional employment. Carrying out public duties (e.g. jury service) does not count as additional employment.
- 16.4 Employees must not use any college property or facilities to support additional employment without prior permission from the CEO and any customer must be informed that the private nature of the work is not connected with Indie Education.

17. SMOKING & SUBSTANCE MISUSE

17.1 Smoking

- 17.1.1 Smoking or vaping is not permitted on any Indie Education site or in the immediate vicinity of any. Appropriate signing out must take place when any employee leaves the premises. This is only permitted at lunch times, except where in the normal performance of duties.

17.2 Alcohol and Substance Use

- 17.2.1 Employees:
- (a) Must not be under the influence of alcohol or any substance which affects their ability to perform their duties, including driving, operating machinery and supervising learners;
 - (b) Must never possess alcohol or illegal drugs or substances at work. Non-prescription drugs, such as ibuprofen or paracetamol and prescription drugs must be kept in an appropriate secure location away from learners;
 - (c) Must advise their line leaders if they are prescribed any medication which may affect their performance or ability to carry out their duties;
 - (d) Must alert site leaders or DCEO and seek professional help as soon as possible if they have alcohol or substance misuse problems and commit to a programme to achieve a successful recovery;
 - (e) Must report to the DCEO or site leader when they suspect that someone is under the influence of or abusing alcohol or substances.
- 17.2.2 National support and advice can be obtained from organisations:
- (a) Drinkline: A free and confidential helpline for anyone who is concerned about their own or someone else's drinking: 0800 917 8282.

- (b) Smokefree: NHS stop smoking support: www.nhs.uk/smokefree.
- (c) FRANK: Advice on what to do to help someone who's having a bad reaction to drugs: www.talktofrank.com/emergency-help.
- (d) Local Authority Health and Wellbeing service.

18. SOCIAL MEDIA

- 18.1 For more information on the acceptable use of social media this section should be read in conjunction with Indie Education Social Media Policy.
- 18.2 Social media is constantly evolving and employees are therefore reminded of their continued responsibility to keep up to date with relevant developments and review their privacy settings on a regular basis when using all social media. Personal profiles must not be accessible to learners or parents and all employees must ensure that any content that is posted or shared is appropriate.
- 18.3 Employees are personally responsible for the content that they publish on social media sites, including "Likes" (on Facebook)/"re-tweets" (on Twitter), You Tube, Snapchat, Instagram, LinkedIn, Yammer, WhatsApp etc.
- 18.4 It is important when using social media that all employees ensure that they do not bring the Indie Education into disrepute, by making potentially false, derogatory, offensive or defamatory comments, either directly or indirectly, about Indie Education, colleagues, individuals, learners or parents that could negatively impact on the college's reputation or cause embarrassment. This includes posting images or links to inappropriate content or using inappropriate language.
- 18.5 Employees must note the following (this list is not exhaustive):
 - (a) Assume that everything can be traced back to them personally as well as to Indie Education, their colleagues, learners and parents/carers;
 - (b) Avoid any conflict of interest and ensure that personal social networking sites are set to private and learners are never listed as approved contacts. An exception to this may be if the child is the employee's own child, relative, or family friend;
 - (c) Potentially false, derogatory, offensive or defamatory remarks (direct or indirect) regarding the Indie Education, employees, learners, learners' relatives, suppliers and/or partner organisations must not be posted on social media site;
 - (d) Employees must not represent their own views/opinions as being those of Indie Education;
 - (e) Learners must not be discussed on social media sites;
 - (f) Information must not be posted that would disclose the identity of learners or could in any way be linked to a learner. This includes photographs or videos of learners or their homes;
 - (g) Employees must not divulge any information that is confidential to Indie Education or a partner organisation;

- (h) Employees must not post information on sites including photographs and videos that could bring Indie Education or themselves into disrepute;
- (i) Employees must not upload, post, forward or post a link to any pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature);
- (j) When posting on social media sites employees must observe the requirements of the Equality Act 2010 and the Human Rights Act 1998 and must not use any offensive, obscene, derogatory, discriminatory language which may also cause embarrassment to Indie Education, employees, learners, learners' relatives, suppliers and partner organisations;
- (k) Employees must never impersonate another person;
- (l) Employees must not upload, forward or post a link which is likely to: create any liability for the college (whether criminal or civil), breach copyright law or other intellectual property rights, or which invades the privacy of any person;
- (m) Employees must not engage or communicate with learners or parents regarding any college matters via their own personal social media accounts. Only the use of Indie Education accounts is permitted for this, and only where there is good reason for doing so;
- (n) Employees must not post content that may breach professional standards or the standard reasonably expected of an employee.

18.6 Indie Education will take disciplinary action against employees for inappropriate use of social media, including use of social media conducted outside of working hours.

19. DISCIPLINARY MATTERS

19.1 Failure to adhere to any of the principles of this Code of Conduct may result in disciplinary action which could result in a range of sanctions up to and including summary dismissal. This includes:

- (a) A personal breach of the Code;
- (b) Failing to promptly report a suspected breach of the Code;
- (c) Encouraging others to breach any part of the Code.

19.2 Employees who do not understand any of the principles contained within this Code of Conduct should seek advice and clarification from the DCEO.

20. POLICY REVIEW

20.1 In accordance with Indie's policy review protocol, this Code of Conduct will be reviewed every three years. If there are material changes to circumstances before the three year review period, this Code of Conduct will be reviewed immediately to ensure its contents remain effective and up to date.

21. AUTHORISATION

21.1 This document has been authorised by the Chief Executive Officer.