Children First
Learning Partnership

INSPIRING EXCELLENCE TOGETHER

Code of Conduct for Staff Employed by the Children First Learning Partnership September 2026

The Staff Code of Conduct in respect of the Children First Learning Partnership has been discussed and adopted by the Directors Board following consultation with Staff and Local Advisory Boards	
Chair of	*Mrs N Chell*
Responsible	*CEO – Mrs A Rourke*
Agreed and ratified by the Directors	*06.07.2026*
To be reviewed:	*July 2027*

Purpose

The Children First Learning Partnership expects high standards of conduct from all employees. This Code of Conduct ("the Code") outlines the rules that apply to all staff employed across the Children First Learning Partnership and provides guidance to help keep to them and ensure the highest standards of conduct. The Code sets out the minimum standards that are expected of employees and provides a framework that will help to prevent misunderstandings or criticism.

Roles and Responsibilities

Local Advisory Boards: The Local Advisory Board has a general role in ensuring that appropriate standards of conduct are established and maintained. Members of the Local Advisory Board may also be involved in dealing with specific declarations made by employees under the Code, where appropriate.

Executive Headteacher/Head of School: The Executive Headteacher/Headteacher is responsible for ensuring that staff are made aware of the Code as part of their induction programme. They may also consider declarations made by employees under the Code and will ensure appropriate action is taken to deal with any alleged breaches.

Employees: All staff employed by The Children First Learning Partnership are required to keep to the standards of the Code and carry out their duties honestly and fairly. Failure to do so is a serious matter and could result in disciplinary action, including dismissal. Employees should therefore ensure that they read the Code carefully and contact their immediate line manager or the Headteacher/Head of School if they have any queries.

Policy statement

The Children First Learning Partnership endorses the following principles:

Selflessness
Employees should take decisions by thinking only of the public interest within the Children First Learning Partnership. They should not do so in order to gain any benefits for themselves, their family or their friends.

Integrity
Employees should not put themselves under any financial or other obligation to any outside person or organisation that might influence them inappropriately in their work. Employees should not act or take decisions in order to gain financial or other material benefits for themselves, their family or their friends. They must declare and resolve any interests and relationships.

Objectivity
Employees must act and take decisions impartially, fairly and on merit, using the best evidence available and without discrimination or bias.

Accountability
Employees are accountable to the Children First Learning Partnership for their decisions and actions and should be open to whatever questioning is appropriate to their role.

Openness
Employees should act and take decisions in an open and transparent manner. Further, employees should give reasons for the decisions and actions they take. They should restrict information only when the wider public interest clearly requires this.

Honesty
Employees should carry out their duties honestly and have a duty to declare any private interests to do with their role within the Children First Learning Partnership. They must resolve any possible conflicts of interest in a way which protects the interests of the Children First Learning Partnership.

Leadership
Employees should promote and support these principles by leadership and example.
The Children First Learning Partnership also expects employees to operate in accordance with the Codes of Conduct provided by their relevant professional bodies.

Standards
All employees must use Trust ICT systems, digital platforms, and online tools in accordance with the CFLP Information Security & Acceptable Use Policy 2026 and the CFLP AI Policy 2026. Staff must not attempt to bypass filtering, monitoring, or other technical safeguards.
All employees are expected to perform to the highest possible standard and to carry out their duties honestly, fairly and with integrity.
All employees must report to the Headteacher/Head of School, or in the case of an allegation against the Headteacher/Head of School/Executive Head the Chair of Local Advisory Board anything illegal, improper or a breach of procedure. The Headteacher/Head of School or the Chair of Local Advisory Board must record, investigate and take appropriate action on such reports and inform the CEO. Please refer to the Children First Learning Partnership's Whistleblowing Policy for further information.

Safeguarding welfare of children and young people

Digital behaviour and the use of emerging technologies, including Artificial Intelligence (AI), form part of the safeguarding environment AI must never be used, unless explicitly authorised and risk assessed, to generate, modify, or process pupil or staff data or imagery. Concerns relating to AI misuse, deepfakes, impersonation, or unsafe automated outputs must be reported immediately to the DSL.

All employees of the Children First Learning Partnership are required to work within the 'Guidance for Safer Working for Adults who work with Children and Young People' provided by the DfE; Keeping Children Safe in

Education (KCSIE 2026) and any additional guidance provided by the Children First Learning Partnership. This aims to safeguard children and young people and reduce the risk of staff and other adults in schools being falsely accused of improper or unprofessional conduct. Please refer to the Children First Learning Partnership Safeguarding Policy for further details.

Employees who receive information about allegations of child abuse should report such information to the Headteacher/Head of School/Designated Safeguarding Lead, as noted in the school's Safeguarding Policy. If the allegations are against the Executive Head/Headteacher/Head of School, the information should be reported to the Chair of the Local Advisory Board who will inform the CEO of the Children First Learning Partnership in accordance with the Children First Learning Partnership Safeguarding Procedure.

Within the CFLP we promote an open and transparent culture in which all concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that adults who work in or on behalf of our school are clear about professional boundaries and act within them in accordance with our ethos and values.

What is a low-level concern?

Low level does not mean that it is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the school may have acted in a way that is: -

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils

All staff have a good understanding of what constitutes a low-level concern, and our local advisory boards ensure that these low-level concerns are included as part of our safeguarding policies in addition to this policy as set out in Part two of KCSiE 2026.

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings. If the Headteacher/CEO/Chair of LAB is in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold they will consult with the LADO. Any member of staff or volunteer who does not feel confident to raise their concerns with the Exec Headteacher /Headteacher/Head of School or Chair of Local Advisory Board knows to contact the LADO on 0300 111 8007.

Staff must report low level concerns to the designated safeguarding lead (DSL) or deputy and be aware that if they fail to report such or behave in a manner that gives rise to such concerns, whilst in or on behalf of the Children First Learning Partnership a breach of this Code of Conduct will occur and proportionate action under the Disciplinary policy will be considered.

Disclosure of information

Employees must comply with UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025, and the CFLP Information Security & Acceptable Use Policy 2026. Information must not be entered into unapproved cloud services or AI platforms.

The Children First Learning Partnership recognises the importance of an open and transparent culture with clear communication and accountability. The law requires that certain types of information must be open to governors, auditors, government departments, service users and the public. An employee should always check first with the Headteacher/Head of School if they are in any doubt as to whether the particular information should be released. The Headteacher/Head of School may seek advice from the Children First Learning Partnership.

Employees must not use any information they obtain in the course of their employment for personal gain or benefit. In addition, employees must not pass information on to others who might use it for their own personal gain.

Employees must only give confidential information or documents to those who have a legitimate right to them. They can only give out information in accordance with the requirements of the Data Protection Act 2018. Please refer to the Children First Learning Partnership's Data Protection Policy for further information.

Information given to employees in the course of their duties should be accurate and fair and not designed to mislead. If an employee believes that information should be disclosed in the public interest, they should follow the Children First Learning Partnership's Whistleblowing Policy. A failure to follow such may result in disciplinary action.

Employees other than the Headteacher/Head of School should not make statements directly to the press or other media without first obtaining the approval of the Children First Learning Partnership except in the case of trade union representatives who are communicating with the media in that role. Headteachers/Heads of School should consult with the Children First Learning Partnership before making statements to the press or other media on major policy issues.

Political neutrality

Employees must not allow their own political opinions to interfere with their work and must at all times perform their duties in an objective manner.

Employees may not display political posters, including election material in areas of Children First Learning Partnership's premises or other Children First Learning Partnership buildings which members of the public have access to. Trade union representatives may display trade union/association views on current issues on the appropriate authorised notice boards within the Children First Learning Partnership.

Where political views are brought to the attention of pupils within the Children First Learning Partnership during extracurricular activities, they should be in the form of a balanced presentation of opposing views.

Relationships

With Governors: Mutual respect between employees and Governors (LAB and Directors) is essential to good Children First Learning Partnership governance. An employee who believes that a Governor has acted improperly towards them may report the matter to their Headteacher or CEO who will take appropriate action.
With the local community and pupils: Employees are expected to be polite, efficient, fair and impartial when they provide services to all pupils, groups and individuals within the community they serve.

With contractors and suppliers: All relationships of a business or personal nature outside work with external contractors or suppliers must be declared to the Headteacher/Executive Head of an individual school or the CEO of the Children First Learning Partnership at the earliest opportunity. Orders and contracts must be awarded on merit and no special favour should be shown to individual or company.

Recruitment and other employment matters

Employees involved in appointing people to posts should ensure that they follow the Children First Learning Partnership's Safer Recruitment Policy. All appointments should be made on the basis of the ability of the candidate and all employees involved in making appointments should ensure that they are made on the basis of merit.
In order to avoid any possible accusation of bias, employees must not be involved in any appointment where they are related to or have a close personal relationship outside work with the person applying. Employees shall disclose to the Headteacher/Head of School within an individual school or the CEO of the Children First Learning Partnership any relationship with any person who they know is an applicant for a post at the Children First Learning Partnership.

Employees should not be involved in, or try to influence, decisions relating to discipline, promotion or pay for any employee who is a relative or with whom they have a close personal relationship outside work.
A "close personal relationship" would include a person not employed by the Children First Learning Partnership with whom an employee has a close business connection.
Personal relationships between colleagues who work together can give rise to conflicts of interest. Therefore, employees who have entered into a close personal relationship or a romantic relationship with a colleague are required to disclose this to the Headteacher/Executive Head of the school or CEO of the Children First Learning Partnership. Any information disclosed or declared should be treated in the strictest of confidence and recorded on both employees' personnel files.

Commitments outside work

Employees' off-duty hours are their private concern as long as they do not:
Put their private interests before their duty to the Children First Learning Partnership;
Put themselves in a position where their duty to the Children First Learning Partnership and private interests' conflict or could appear to conflict; or

Do anything which could adversely affect their suitability to carry out their duties or the reputation of the Children First Learning Partnership
Allow volunteering work to conflict with their employment at Children First Learning Partnership.

Teaching staff and support staff graded above 6 (or its equivalent) may not carry out any other business or take up any additional employment without the permission of the Children First Learning Partnership. Employees should complete the appropriate form and submit it to the Exec Headteacher/Headteacher. The Children First Learning Partnership will not unreasonably prevent employees from carrying out other employment. However, this employment must not, in the view of the Children First Learning Partnership conflict with its interests and specific conditions may be set out to manage this.

The following conditions apply to all commitments outside work:

- Employees must not carry out private work (whether paid or unpaid) relating to the Children First Learning Partnership without permission from the Children First Learning Partnership.
- Employees must not carry out any work related to a private interest (including taking or making telephone calls) during normal working hours;
- Employees must ensure that any additional hours worked do not contravene the Working Time Regulations 1998 or otherwise give the Children First Learning Partnership cause for concern relating to health and safety at work;
- The outside work must not damage or potentially damage public confidence in the Children First Learning Partnership's conduct or business;
- An employee must not use the Children First Learning Partnership's facilities, equipment or confidential information; and
- All approvals will be reviewed regularly and may be withdrawn if thought necessary.

Some staff, particularly teachers, may wish to use their professional expertise to do other work, for example examination marking or private tuition. It is recognised that this can be of value to the Children First Learning Partnership. The Children First Learning Partnership will not normally prevent employees from undertaking additional employment if it is satisfied that it does not conflict with the interests of or weaken public confidence in The Children First Learning Partnership. The provisions of this section are not intended to apply to trade union officers engaged in legitimate trade union duties and activities.

Conduct outside work

Whether in or outside work, employees must not conduct themselves in any way that creates doubt as to their suitability for their post or in a way that would bring the Children First Learning Partnership into disrepute. This would include conduct which would bring an employee's suitability to work with children into question.
All employees working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people in their care. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and their colleagues.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or indicate unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

Employees in contact with children and young people should therefore understand and be aware that safe practice also involves using judgement and integrity about behaviours in places other than Children First Learning Partnership premises.

The behaviour of an adult's partner or other family members may raise similar concerns and may require careful consideration by the Children First Learning Partnership as to whether there may be a potential risk to children and young people in the workplace.

Personal interests

Employees must declare to the Headteacher/Executive Head on the appropriate form, any financial or non-financial interests that could conflict with the Children First Learning Partnership's interests.
Section 117 of the Local Government Act 1972 requires employees to make a formal declaration about any contract with the Children First Learning Partnership or local authority where they have a financial interest, as set out in Annex A. Employees should complete the appropriate form and send this to the Headteacher/Executive Headteacher. Failure to comply with this requirement is a criminal offence.

Employees must not be involved in decisions about matters in which they have a personal interest.

Employees must declare membership of any organisation that is not open to the public, does not have formal membership and has secrecy about rules, membership or conduct. A definition of such an organisation is provided in Annex B. Employees should complete the appropriate form and send it to the Headteacher/Executive Head or, in the case of the Headteacher/Head of School or Executive Head, to the CEO of the Children First Learning Partnership

If an employee is in doubt as to whether there is a conflict of interest, they should seek further guidance from Executive Head/Headteacher.

Equality

All members of the local community, parents, carers and employees have a right to be treated fairly and equally. Employees must follow the Children First Learning Partnership's policies on equal opportunities, in addition to the requirements of the law.

Tendering procedures

Employees should act fairly and impartially when dealing with tenders, contractors and sub-contractors. Employees should ensure that any personal interests which may be relevant to tenders are declared in accordance with paragraph 11 of the Code.
Employees involved in the tendering process or dealing with contractors should make sure that they are aware of the separate roles of clients and contractors. A summary of key legal conditions is provided in Annex C. Employees must deal fairly and impartially with all customers, suppliers, contractors and sub-contractors.

Employees who access to confidential information on tenders or costs relating to contractors must not give that information to any unauthorised person or organisation.

Corruption

It is a serious criminal offence under the Prevention of Corruption Acts for employees to corruptly receive or give any gift, loan, fee, reward or advantage or to show favour or disfavour to any person. If an allegation is made it is for the employee to prove that any rewards have not been corruptly gained or given. A summary of the legal provisions appears in Annex D.

Employees should report any suspicions in relation to any conduct or activity which may be aimed at obtaining some form of preferential treatment to the Headteacher/Executive Head Please refer to the Children First Learning Partnership's Anti-corruption and Bribery Policy for more information.

Use of financial resources

Employees involved in financial activities and transactions must follow the Children First Learning Partnership's scheme of delegation and financial regulations and guidance and the Academy Trust Handbook.

Employees must use public funds in a responsible and legal way, try to make sure that the Children First Learning Partnership provides value for money to the local community and avoid legal challenges to the Children First Learning Partnership.

Gifts and other benefits

The offer of gifts or benefits in kind to employees (or their partners or family members) arising from their official duties could cause a conflict between their private and public interests.
Unless the exceptions below apply, employees should refuse any personal gift offered to them, their partner or family member by any person or organisation who has dealings with the Children First Learning Partnership Employees must declare any offer on the appropriate form and say what action they have taken. This should be given to the Headteacher/Exec Headteacher, or to the CEO if the offer is made to the Headteacher/Head of School. The exceptions are:

Gifts made at the end of a courtesy visit to an organisation that are of a promotional nature and of a kind normally given by the organisation;

- Gifts of token value such as diaries, calendars and pens; or
- Gifts of token value given by pupils or parents at Christmas or at the end of term.

As offering gifts is a common practice in the business world particularly at Christmas time, they should be refused politely. If, for example, a gift is simply delivered to an employee's place of work, there may be a problem returning it, in which case, it should be immediately reported to the Headteacher/Exec Headteacher who will decide on the appropriate action.

Employees who have a caring role or who provide a direct personal service may come across special problems. For example, parents may wish to say thank you by offering gifts or money. This needs to be handled tactfully.

Employees should refuse gifts politely and explain why they cannot accept them. Where it has not been possible to return a gift, this must be reported immediately to the Headteacher/Exec Headteacher who will give more guidance.

Hospitality

A modest amount of hospitality is a normal part of public life but it is important not to risk undermining public confidence or allow it to appear that it may improperly influence the way in which employees carry out their duties. Hospitality is sometimes offered to employees in a formal capacity, such has attending exhibitions, seminars, sporting events, shows or concerts.

Employees must be particularly careful if they are offered hospitality by someone who wants to do business with or obtain a decision from the Children First Learning Partnership. It is important to avoid any suggestion of improper influence. Employees should accept an offer of hospitality only if they genuinely need to go to an event to receive or give information, represent the Children First Learning Partnership in the community or make prior visits to check arrangements, particularly in relation to health and safety (for commercially organised visits, journeys or activities involving pupils). They should only accept offers to attend purely social or sporting occasions if these are part of the life of the community or the Children First Learning Partnership should be seen to be represented.

If hospitality has to be declined, this should be done politely with an explanation of the Children First Learning Partnership's rules on hospitality.

Employees should use the appropriate form to notify all offers of hospitality to the Headteacher/Executive Head. If the offer is made to the Headteacher/Executive Head, the offer of hospitality should be reported to the CEO. This is not required if the hospitality is of token value, for example a single drink. A record should be kept of any offers of hospitality made to employees, including the Headteacher/Head of School.

Sponsorship

The above rules relating to gifts and hospitality also apply where an outside organisation wishes to sponsor or is approached to sponsor a The Children First Learning Partnership activity. This may be by invitation, tender, negotiation or voluntarily. Employees should be particular careful when dealing with current or potential contractors.

Any employee who, or whose partner or family member, would directly benefit from sponsorship of an activity by the Children First Learning Partnership, must declare this on the appropriate form and send it to the Head/Exec Head or the CEO in the case of the Headteacher/Head of School.

Employees must give impartial advice and avoid any conflict of interest where the Children First Learning Partnership gives support in the community through sponsorship, grant aid or financial or other means.

Retention and access to declarations

Declarations made on appropriate forms are subject to the retention periods and access categories set out below:

Public access is allowed in situations that can raise particular public concerns (since they relate to financial interests) and the public interest in being able to see that appropriate declarations are made and the extent to which employees have such relationships overrides the need to protect the personal privacy of employees.

Internal access by Local Advisory Board members of the Children First Learning Partnership, councillors, local authority officers or district audit concerns declarations that relate primarily to the personal interests of employee. This is to maintain a balance between public interest and privacy issues.

Relationship with other policies and procedures

Employees should ensure that they perform their duties in accordance with all policies and procedures adopted by the Children First Learning Partnership. In particular, employees' attention is drawn to the following policies:

Anti-corruption and bribery policy: This procedure should be used to deal with concerns regarding conduct or activity where the objective is to obtain some form of preferential treatment.

Disciplinary Procedure: This procedure should be used to deal with an allegation against a member of staff that they have acted in breach of the Code.

Safeguarding Policy: This policy should be followed if an allegation concerns the abuse of a child.

Whistleblowing Policy: This should be followed to disclose information which relates to suspected wrongdoing or dangers at work.

Monitoring and review

Feedback is encouraged on the effectiveness of this Code of Conduct. It will be reviewed regularly to ensure it is appropriate in light of recommended best practice and complies with employment law. In the event of any conflict with statute, the legal provisions will have precedence over this policy in all cases.

The Children First Learning Partnership will monitor the application of this Code of Conduct, particularly to ensure that its practices comply with it and are not discriminatory.

Annex A - Section 117 of Local Government Act 1972

If it an employee becomes aware that they have a direct or indirect financial interest in a contract which the Children First Learning Partnership or local authority has entered into or intends to enter into, they must declare this immediately.

An employee must not accept any fee or reward other than their normal salary.

If an employee breaks either of the conditions shown above, they can be prosecuted and fined. The maximum fine is Level 4 on the Standard Scale.

Annex B - Organisations to which rules about personal interests apply

- Any lodge, chapter, society, trust or regular gathering or meeting, which:
- is not open to members of the public who are not members of that group;
- includes an obligation on the part of the member to make a commitment of allegiance to the lodge, chapter, society or gathering or meeting; and
- includes a commitment of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.
- Freemasons are considered to come within this definition.
- A lodge, chapter, society, trust, gathering or meeting is not to be regarded as a secret society if it forms part of the activity of a generally recognised religion.

Annex C – Local Government Competition Regulations

The following summarises some of the key principles to be observed:

All employees should:

- avoid acting in a way which restricts or prevents competition or is likely to have that effect;
- do nothing that would distort or inhibit competition; or
- treat outside bidders or contractors equally with the authority's direct service organisation. For example, information given to the direct service organisation about the work which is subject to competition must be made available to all bidders.

Annex D - Prevention of Corruption Acts 1906 and 1916

Under the Prevention and Corruption Acts 1906 and 1916 it is an offence for employees to accept any gifts or other benefits for:

- doing, or not doing, anything in their official capacity; or
- showing favour or disfavour to any person in their official capacity.

- Under the Prevention of Corruption Act 1916 any money, gift or consideration received by an employee from a person or organisation holding or trying to get a contract will be treated as corrupt unless the employee proves differently.

Version Control

Version	Date	Amendment	By
V7	May 2026	Integrated Information Security & Acceptable Use Policy 2026 and AI Policy 2026 requirements	CEO