

**THE WHEELS PROJECT LTD**  
**31-32 Bonville Road**  
**Brislington**  
**Bristol BS4 5QH**  
*Registered Charity No: 1081236*

## **CODE OF CONDUCT POLICY**

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## **1. Introduction**

All employees have personal and legal responsibilities, including treating others with dignity and respect, acting honestly when using public funds and The Wheels Project equipment appropriately, adhering to health and safety guidelines and practicing equal opportunities at all times. These expectations are set out below and should be fully observed by all staff, including the General Manager and Board of Trustees.

This document is not a prescriptive guide to what employees should and should not do. It highlights the principal areas where employees need to be aware of their responsibilities when working at The Wheels Project and is a framework for behaviour. Employees should ensure they are familiar with the specific policies that underpin these behaviours through reference to the documents highlighted in the “Required reading” throughout the policy. If these documents are not supplied at induction, the employee/s should ask the General Manager for copies.

## **2. Compliance with the Code of Conduct**

The Code of Conduct forms part of an employee’s contract. Failure to comply with it and with the associated The Wheels Project policies (“Required reading”) may result in disciplinary action being taken. The Wheels Project reserves the right to take legal action against employees where breaches of the Code warrant such action.

## **3. Professional behaviour and conduct**

### **3.1 Treating other people with dignity and respect**

All employees are expected to treat other colleagues, pupils, and external contacts, such as parents, with dignity and respect.

Staff are required to comply with The Wheels Project's equality policies in respect of colleagues, students, and other contacts such as parents. Unacceptable behaviour such as discrimination, bullying, harassment, or intimidation will not be tolerated at The Wheels Project. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour with colleagues, pupils, and parents.

### **3.2 Appropriate relationships with children**

The Wheels Project employees are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. Employees at The Wheels Project are in a position of trust and have a duty to protect young people from discrimination and harm and to maintain appropriate professional boundaries. It is equally important for staff to avoid behaviour that might be misinterpreted by others in order to protect both young people and themselves. Staff are required to read and understand The Wheels Project policies on *Child Protection and Safeguarding*.

### **3.3 Professional behaviour**

Employees must not misuse or misrepresent their position, qualifications or experience or bring the reputation of The Wheels Project into disrepute. Such behaviour may lead to

disciplinary action and where relevant, referral to the Board of Trustees.

### **3.4 Criminal actions**

The Wheels Project employees must inform the General Manager (Board of Trustees if the employee is the General Manager) immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution. The General Manager or Board of Trustees will discuss this with the employee in the context of their role and responsibilities in order to help safeguard children and other employees at The Wheels Project.

### **3.5 Required reading:**

- The Wheels Project Safeguarding Children policy and procedure
- The Wheels Project Equalities Policy

## **4. The Wheels Project Code of Conduct & Practice for Employed & Volunteer Staff**

### **4.1 Declaration of interests**

An employee is required to declare this where the group or organisation would be considered to be in conflict with the ethos of The Wheels Project. Membership of a trade union or staff representative group would not need to be declared.

Employees should also consider carefully whether they need to declare to The Wheels Project their relationship with any individual(s) where this might cause a conflict with The Wheels Project activities. For example, a relationship with a School Governor, another staff member or a contractor who provides services to The Wheels Project.

Failure to make a relevant declaration of interest is a very serious breach of trust and therefore if employees are in doubt about a declaration, they are advised to take advice from the General Manager at The Wheels Project.

All declarations, including nil returns, should be submitted in writing to the General Manager on a Register of Business Interest.

## **5. Probity of records and other documents**

The deliberate falsification of documents is not acceptable. Where an employee falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

Where an employee who has claimed any benefit, including housing benefit, either directly or indirectly and has failed to disclose their full earnings, this will be treated as gross misconduct and the employee may be dismissed and referred to the Police.

## **6. Financial inducements**

### **6.1 Financial Regulations for The Wheels Project**

All of The Wheels Project employees must comply with The Wheels Project's Financial Regulations. Employees should familiarise themselves with the regulations but some of the principal employee requirements are summarised below.

### **6.2 Business Contacts**

In this section, "**business contact**" refers to any person, body or organisation with which The Wheels Project is involved on a financial or charitable basis (including contractors; developers; consultants; regional or national charities). This also includes business contacts who are potential suppliers (e.g., they are tendering for future business).

#### **6.2.1 Declaration of gifts**

Any gifts that are received should be declared in writing to the Governing Body on the Register of Gifts and Hospitality (Appendix 2) with the exception of those items specifically identified in sections 6.4 and 6.5 below. This document shall remain available for inspection by The Wheels Project appointed Auditor.

### **6.3 Gifts or hospitality to the Wheels Project**

Where a business contact sends a gift to the Wheels Project (for example, a stationery supplier sending a gift), these should not be accepted and should be returned to the supplier. Such offers should be declared to the General Manager and recorded in the Register of Gifts and Hospitality.

If it is not possible to return the gift, the employee who usually deals with the supplier should declare the gift to the General Manager who will keep a record of it and decide how it is to be used. Such gifts remain the property of The Wheels Project and should be included in the Register of Gifts and Hospitality.

The only exceptions to this are low cost, functional items suitable for business use (as opposed to personal use), such as diaries, calendars, or pens, may be accepted and do not have to be declared on the Register of Business Interests.

## **7. Use of The Wheels Project contacts**

Apart from participating in concessionary schemes arranged by trade unions or other such groups for their members, employees shall not use The Wheels Project business contacts for acquiring materials or services at trade / discount prices for non-project activities.

## **8. Other employment**

Employees are permitted to take up secondary employment outside The Wheels Project, as long as the activity does not constitute a conflict of interest, adversely affect their primary employment at The Wheels Project or exceed the legal maximum working week of 48 hours as defined by the Working Time Regulations.

The secondary employment must be undertaken outside the working hours of the employee's normal post and employees are required to keep the General Manager (Board of Trustees if the employee is the General Manager) informed of their employment at another organisation.

## **9. Health and safety**

Employees must adhere to The Wheels Project's Health and Safety policy, procedure and guidance and must ensure that they take every action to keep themselves and everyone in The Wheels Project environment safe and well.

This includes taking immediate safety action in a potentially harmful situation (either at The Wheels Project or off-site) by complying with statutory and The Wheels Project guidelines and collaborating with colleagues, agencies, and the local authority.

### **9.1 Required reading:**

- The Wheels Project's Health and Safety Policy.

## **10. Use of alcohol and illegal drugs**

The taking of illegal drugs during working hours is unacceptable and will not be tolerated. All employees are expected to attend work without being under the influence of alcohol or illegal drugs and without their performance being adversely impacted by the consumption of alcohol or illegal drugs.

If alcohol or drug usage impacts on an employee's working life, The Wheels Project has the right to discuss the matter with the employee and take appropriate action, having considered factors such as The Wheels Project reputation and public confidence.

## **11. Use of The Wheels Project premises, equipment & communication systems**

The Wheels Project equipment and systems (phone, email, and computers) are available only for The Wheels Project-related activities and should not be used for the fulfilment of another job or for personal use. This is unless authorised by the General Manager (*NB for the **General Manager this is the Chair of the Board of Trustees***); in case of an emergency or were used for brief periods outside of working hours.

This includes photocopy facilities, stationery, and premises. It also applies to access provided for remote use (e.g., handheld portable devices etc.) and to staff working outside of The Wheels Project premises and using their own IT equipment.

Illegal, inappropriate, or unacceptable use of The Wheels Project equipment or communication systems may result in disciplinary action and in serious cases could lead to an employee's dismissal. This list is not exhaustive and includes: -

- creating, sending, or forwarding any message that would reasonably be considered inappropriate or unacceptable

- committing or implying commitment to any contractual arrangements
- accessing, publication or circulation of illegal, offensive, unacceptable, inappropriate, or non-work-related material
- any illegal activities
- posting confidential information about The Wheels Project and/or other employees, children, or parents
- gambling or gaming
- unauthorised use of facilities at the Wheels Project (or employee's personal IT equipment), for personal use during employee's working time.

Employees receiving inappropriate communication or material or who are unsure about whether something he/she proposes to do might breach this policy should seek advice from the General Manager.

The Wheels Project has the right to monitor e-mails, phone-calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems. Communication systems may be accessed when The Wheels Project suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

Passwords should not be shared and access to computer systems must be kept confidential. Breach of this confidentiality may be subject to disciplinary action. Where appropriate, The Wheels Project should consider a system of proxy access.

Any of The Wheels Project equipment that is used outside of The Wheels Project premises, for example laptops, should be returned to The Wheels Project when the employee leaves employment or upon request by the General Manager.

## **12. Social networking websites**

The Wheels Project employees must not access social networking websites for personal use (i.e., non-job-related use) during work time.

Access to some journals, blogs and social networking sites is permitted during work time for the purposes of undertaking job related duties only. The Wheels Project employees must act in the best interests of The Wheels Project and not disclose personal data or information about any individual including staff, young people, or children. This includes images. Access may be withdrawn, and disciplinary action taken if there is a breach of confidentiality or defamatory remarks are made about The Wheels Project, staff, young people, or children.

The Wheels Project respects an employee's private life. However, it must also ensure that confidentiality and its reputation are protected. Employees using social networking websites in their private life: -

- must refrain from identifying themselves as working for The Wheels Project, in a way which has, or may have, the effect of bringing the Project into disrepute
- must not identify other Wheels Project employees, children, or young people without their consent

- must not make any defamatory remarks about The Wheels Project, its employees, children, or young people, or conduct themselves in a way that is detrimental to the Project
- disclose personal data or information about The Wheels Project, its employees, children, or young people, that could breach the Data Protection Act 1998, for example, posting photographs or images of children or young people.

must not allow pupils to access their personal social networking accounts and where they are contacted by a pupil, they should bring it to the General Manager's attention.

### **13. Personal Websites and Blogs**

Employees who wish to set up personal web forums, weblogs or 'blogs' must do so outside of work and not use The Wheels Project equipment. They must adhere to the points detailed in the paragraph above.

### **14. Confidentiality**

All employees at The Wheels Project along with the Board of Trustees will come into contact with a significant volume of data and information in relation to pupils, staff, The Wheels Project activities and many other matters. There is an obligation to read and to observe the requirements of the Data Protection Act 1998 and GDPR May 2018.

#### **14.1 Required reading: Data Protection Guide**

<https://www.gov.uk/government/collections/data-protection-act-2018>

#### **14.2 Managing data**

Under the Data Protection Act, staff are required to collect, maintain, and dispose of sensitive or personal data in a responsible manner.

#### **14.3 Disclosing data**

Staff should not disclose sensitive information about The Wheels Project, its employees, or the local authority to other parties, for example, parents or colleagues. There are particular exceptions to this; for example, disclosure of suspected or alleged abuse of a pupil to Safeguarding officers; discussion with a person accompanying or representing an employee in a formal meeting or disclosure under the Whistleblowing Procedure. All communication with the media must be directed through the General Manager or their nominee.

There are circumstances in which staff are obliged to release pupil data, for example, parents seeking information about pupil progress or other colleagues in The Wheels Project.

Staff should be aware that, from time to time, information about employees' salaries is matched with public sector information (for example housing benefits) in order to prevent fraudulent claims.

#### **14.4 Access to data**

Everyone has the right to request access to data that is held about them, and such requests should be made to the General Manager who will address the request in conjunction with the Local Authority's Data Protection Officer.

## **15. Copyright**

Copyright legislation should be displayed next to photocopier machines and employees are required to adhere to the guidance provided about use of educational resources.

### **15.1 Required reading: Copyright Notices**

<https://www.gov.uk/guidance/copyright-notices>

# APPENDIX ONE

## REGISTER OF BUSINESS INTERESTS FORM

### Trustees and staff declaration form

I wish to declare the following information in accordance with the Governing Body's requirements that a Register of Business Interests should be maintained.

**Name:**

**Signature:**

**Date:**

You should provide full details of your declaration below, including a nil return:

| Declaration of relationships or contracting arrangements   |   |
|--|---|
| Relationships or links with businesses. Contracts or proposed contracts (or any activity which would cause potential conflict) in which you are involved / interested. | State whether the interest is direct or indirect, and the nature of the interest. |
|  |   |

## APPENDIX TWO

### REGISTER OF BUSINESS INTERESTS FORM

#### Trustees and staff declaration form

I wish to declare the following information in accordance with the The Wheels Project Ltd/Board of Trustees requirements that a Register of Business Interests should be maintained. I wish to declare the following information in accordance with the The Wheels Project Ltd/Board of Trustees requirements that a Register of Gifts and Hospitality should be maintained.

**Name:**

**Post:**

**Signature:**

**Date:**

You should provide full details of your declaration below, including a nil return:

| Declaration of gifts and hospitality |           |                     |
|--------------------------------------|-----------|---------------------|
| Date gift received                   | From whom | Gift or hospitality |
|                                      |           |                     |
|                                      |           |                     |
|                                      |           |                     |
|                                      |           |                     |