



HCAT

Code of Conduct

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HCAT Code of Conduct

1. Introduction

- 1.1. This policy has been developed in consultation with Trade Unions and Professional Associations who are recognised by HCAT.
- 1.2. The purpose of this code is to promote consistency and make all employees aware of their responsibilities whilst engaged in work for the Trust, by specifying standards of behaviour and by clearly defining rules concerning official conduct.
- 1.3. The Trust believes that employees are responsible for their actions. It is the responsibility of employees to read this Code of Practice in conjunction with the Policies and Procedures referred to within this document. If any of the provisions contained within this Code of Conduct are not fully understood employees must, in their own interests, seek clarification from their Headteacher, Line Manager or Trust HR.
- 1.4. Employees must comply with this Code as it forms part of their terms and conditions of employment, and it may be amended at any time. Any amendments will be communicated by email to all employees.
- 1.5. Failure to observe the standards set out in this Code may render an employee liable to disciplinary action, which may include dismissal (**see Disciplinary Procedure**).

2. Scope

- 2.1 This policy applies to all employees of HCAT (the Trust) including those employed by Academies within the Trust.
- 2.2 Any other persons working with our children and/or on Trust premises for example Governors, Trustees, agency staff, volunteers and contracted services, are also expected to adhere to this Code of Conduct.

3. Principles

- 3.1 Failure to observe the standards set out in this Code may render an employee liable to disciplinary action, which may include dismissal.
- 3.2 All employees of HCAT have a Common Law Duty of loyalty to their employer and any failure to fulfil this duty will be treated as a breach of this Code of Conduct. This means that whilst this Code will not specifically cover every eventuality, employees should be aware that conduct which is considered as unreasonable or disloyal will be treated as a breach of the Code.
- 3.3 All employees of HCAT have a statutory responsibility to ensure that children are effectively safeguarded from the potential risk of harm in school. The safety and wellbeing of the children is of the highest priority in all aspects of the school's work.
- 3.4 HCAT recognises several Trade Unions, actively consults, and negotiates with colleagues on a wide range of issues, encouraging positive relationships with the understanding that there will be differences of opinion at times. Employees therefore may well have legitimate roles to carry out: as Trade Union representatives; community action group representatives; tenant committee members etc. These roles may involve taking part in public meetings, making statements to the press or acting on behalf of their group. Employees, from the outset, should make clear the capacity in which they are speaking or making statements. In this

capacity, the employee should exercise great care to present factual information in order to avoid any personal opinions which may be damaging to the Trust. Likewise, they should refrain from making any derogatory or defamatory remarks about other employees or Trustees. Section 10 of this Code specifically refers to contact with the press and media.

- 3.5 When carrying out legitimate roles as Trade Union Representatives, community action group representatives; tenant committee members etc. employees should also refer to their organisations Code of Conduct.
- 3.6 When allegations are made against an employee as a result of carrying out a legitimate role, all perspectives will be considered, and allegations will be subject to thorough investigation before any action in accordance with procedure is considered.
- 3.7 Employees should always be mindful that they are ambassadors for the Trust and therefore should not put themselves in a position where their honesty or integrity could be called into question. Employees should be aware of the potential for public perception to be different to their own and avoid placing themselves at risk of allegation of wrongdoing. Consideration will be taken of all perspectives and any allegations will be subject to investigation before any action in accordance with procedure is considered.
- 3.8 The Trust reserves the right to monitor its employees (for example the use of internet and email) where misuse is suspected; covert surveillance will be engaged in extreme circumstances, for example when criminal activity or malpractice is suspected and where there are CCTV systems already in place (i.e. in our secondary settings). Footage will be reviewed and used as evidence where necessary. Please refer to, and follow, the guidance published by the Information Commissioner's Office. (Link)
- 3.9 The recording of meetings must be with the agreement of all parties present. Anything recorded without permission or the correct procedure having been followed as per the ICO guidance cannot be used.
- 3.10 Employees will be expected, without fear of recrimination, to bring attention to the appropriate level of management, concerns about how Trust (and individual school) resources are managed or provided. The Trust operates a **Whistleblowing Policy** for this.

4. Safeguarding

- 4.1 Everyone who comes into contact with children and their families and career has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all employees should make sure their approach is child centred. Employees **must** ensure they familiarise themselves with the Trust's **Safeguarding and Child Protection Policy** where this is covered in detail.

5. Public Duty, Private Interest - General

- 5.1 An employees' duties and private interests must not conflict. Employees must declare any private interests relating to their duties which may include, but is not limited to, membership of organisations which would generally be considered to conflict with their duties. For example, where there may be some financial benefit to the employee. Please contact Trust HR to seek advice if unsure.

6. Reasons for Leave of Absence

- 6.1 Trust employees must not use their position to obtain gain for themselves, business associates, friends or family either directly or indirectly.
- 6.2 Employees must be aware that it is a serious criminal offence that carries a custodial sentence for them to receive or give corruptly any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity.
- 6.3 HCAT acknowledges the responsibility it has for the administration of public funds and emphasises to the public and its employees the importance it places on probity, financial control and honest administration. The Trust is also committed to the fight against fraud, whether perpetrated by employees, contractors or the public.
- 6.4 Employees must use public funds responsibly and lawfully. They must work to ensure the Trust uses its resources prudently and within the law and that the public are assured of value for money and those of the Education Skills and Funding Agency (ESFA) must be observed.
- 6.5 Defrauding and stealing (or attempting to do so) from the Trust or any person or organisation in any way will not be tolerated. This includes the falsification of claims, for example mileage and travel/subsistence allowances with the intention of obtaining payment. Employees should be aware that the Trust also shares data with other Government agencies such as the Department for Work and Pensions and the Inland Revenue when requested.
- 6.6 Employees should not use Trust procurement processes for personal purchases, unless authorised to do so.
- 6.7 Genuine concerns relating to potential fraud, theft or unethical behaviour must be reported to the Headteacher/Head of School/Principal, Local Governing Body (Chair of Governors) or the Chief Executive. Further details are contained in the **Anti-Fraud and Anti-Corruption Policy**.
- 6.8 It is acknowledged that it is not easy to report irregularities and, in every case, full support will be given and every effort will be made to respect an employees' request for anonymity. Employees are however expected to demonstrate accountability and to co-operate fully with any scrutiny appropriate to their positions. If allegations are found to be malicious or false, disciplinary action may be taken.
- 6.9 In the case of investigation of fraud, theft and/or irregularity within academies, **Anti-Fraud and Anti-Corruption Policy** governs how the situation must be addressed.

7. Public Duty, Private Interest – Gifts and Hospitality

- 7.1 Employees must be careful in the exercise of their duties not to show by their behaviour that they may be influenced by any gifts or hospitality whilst acting in an official capacity.
- 7.2 If you are offered a gift you should consider whether it is one of "low" value (i.e. £25 or less). Any gifts or hospitality in excess of £25 should be reported to the Headteacher/Head of School/Principal, who should then take a view as to whether the gift may be acceptable or should be declined in order to protect the individual receiving the gift.

The following are examples of gifts that may generally be acceptable: -

- Small gifts of little value that have been sent or given as an advertisement for a particular firm, for example, appropriate calendars, diaries or other items for general use in the office.

- Small gifts of low value such as a bottle of wine or a box of chocolates that have been given at the end of work on a specific project. However, such gifts should be made generally available to all those who have worked on the project.
- Small gifts of low value such as a pen or a coffee mug that have been given at the end of a courtesy visit, for example, to or from a factory or agency.
- Christmas boxes – in certain jobs it has been traditional for members of the public to give the team concerned gifts with varying financial values. As this is a normal and well-established practice, acceptance of the Christmas gift, on behalf of the team concerned, is acceptable, provided:
 - The gift is not solicited or requested either directly or indirectly.
 - There is no suggestion that decisions concerning the service, or the quality of the service provided will change in any way
 - Any gift that is of such a value that it falls outside a normal range is notified to the (Executive) Principal/Headteacher/Head of School/line manager.

Hospitality

- 7.3 Employees should exercise discretion in offering and accepting hospitality. Acceptance of meals and refreshments for example may be a necessary part of Trust business, i.e. provided to enable the parties to continue discussion. The meals or refreshments must be of a modest kind and if possible, the employee should pay for their own meal and claim for reimbursement.
- 7.4 In deciding whether to accept hospitality, regard should be given to the following:
- Whether the person or firm offering the hospitality is likely to benefit from the hospitality.
 - Whether that person or firm is seeking a contract or admission of a child to roll, or one has already been awarded.
 - The timing of the hospitality in relation to decisions which the Trust may take which will affect those offering it.
 - Whether it is preferable in the circumstances to entertain the person or persons concerned at the Trust's premises or at the Trust's expense.
 - The scale and location of the hospitality and whether it falls within working hours.
 - Whether a proposed visit is genuinely instructive or constitutes more of a social function.
 - The frequency of the hospitality.
- 7.5 In all cases employees should be able to justify the arrangements they have made in the interests of the Trust.
- 7.6 If an employee has any doubt about the acceptance of an invitation, this should be discussed with their Line Manager, Headteacher/Head of School/Principal. Employees must discuss any offers of hospitality over and above meals and refreshments prior to accepting or declining them.
- 7.7 Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal, where the Trust gives consent in advance and where the Trust is satisfied that any purchasing decisions are not compromised. Where visits to inspect equipment, etc. are required, employees should ensure that the Trust meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions.
- 7.8 Employees must record any hospitality, received or offered, on a **Register of Interests/Hospitality and Gifts form (Appendix 1)**, to be held and monitored by each Line Manager, Headteacher/Head of School/Principal where appropriate.
- 7.9 The only hospitality not required to be recorded in accordance with the above paragraph, is hospitality of a modest kind received during normal working hours and while conducting the Trust's business. This would include light refreshments such as tea, coffee, biscuits and a sandwich lunch or similar.

Legacies

7.10 An employee can sometimes (although rarely) be included in the Will of someone with whom they have worked with. On the one hand this can reflect the genuine wish of a client to register thanks to someone who has helped look after them and/or their child, perhaps over several years. On the other hand, such gestures could be open to misinterpretation, particularly if a large sum of money is involved. It is, therefore, a rule that an employee must notify the Chief Executive Officer if they are left a legacy which is connected with their employment or if the person in question was in receipt of a Trust service. Failure to disclose receipt of a legacy may result in disciplinary action.

Sponsorship – Giving and Receiving

7.11 Where an outside organisation wishes to sponsor or is seeking to sponsor Trust activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Care must be taken when dealing with contractors or potential contractors.

7.12 Any instances of sponsorship must be brought to the attention of the Trust Board, so that a full assessment of the financial, reputational and legal implications can be scoped.

7.13 Where the Trust 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 the employee's Line Manager, Headteacher/Head of School/Principal of any such interest. Similarly, where the Trust 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.

8. Relationships

Relationships Between Employees/Potential Employees

8.1 It is important to remember that personal relationships at work may not be limited to sexual or romantic relationships but can also include family relationships and very close friendships, all of which can complicate dynamics and wider relations in the workplace.

8.2 Where a personal relationship exists between employees, an employee should declare this to their Line Manager, Headteacher/Head of School/Principal if the relationship could be deemed as a conflict of interest, trust or breach of confidentiality. Also, where a personal relationship exists between employees who are in a line management or supervisory relationship at work, then they must not be involved in Recruitment and Selection, improving performance, pay and grading, disciplinary, grievance or any other management activity involving the other employee.

8.3 Where an employee is involved in appointments, where the recruiting employee is related to an applicant, or has any personal relationship with them outside work, they must not be involved in the recruitment process.

8.4 Whilst we understand and accept that there will be personal relationships at work and would not interfere with an employee's right to a private life, our expectation is that personal relationships do not impact on the professional standards we expect. Where, for example, there is evidence of a misuse of power, preferential treatment of employees, inappropriate behaviour in the workplace, breaches of confidentiality or financial irregularity, the appropriate formal procedures would be followed.

Relationships when dealing with Case Work

- 8.5 Where an individual knows, or has any relationship with a client/student or a member of their family, it would be appropriate for that individual to consider, along with their Line Manager, Headteacher/Head of School/Principal whether there is likely to be any potential conflict of interest or alleged conflict of interest which may affect the working of the case, particularly if the case involves a child. This consideration should be documented along with the decision for the individual to retain or to pass on the case and the reasons for the decision arrived at.

Relationships with Contractors

- 8.6 Employees must disclose to their Line Manager, Headteacher/Head of School/Principal all relationships of a business or private nature with external contractors or potential contractors. Orders and contracts must be awarded on merit, by fair competition against other tenders, and no special favour should be shown for businesses run by, for example, friends, partners or relatives in the tendering process. This information should be shared using the **Register of Interests/Hospitality and Gifts form (Appendix 1)**.

Relationships with Students – Exams

- 8.7 In accordance with Examination Regulations, employees who teach their own children, or who work in the same school as their own children, must complete a non-disclosure form (**Appendix 2**) to confirm that they will not disclose any grades to their child/children before results day.

9. Secondary Employment and Outside Commitments

- 9.1 The Trust's duty of care under the Working Time Regulations requires that reasonable steps are taken to ensure that workers do not exceed an average 48 hours per week. The Trust prefers its full-time employees not to have paid secondary employment of any kind. The Trust recognises that many of its part time employees may have secondary employment. However, all employees are required to declare to their Line Manager, Headteacher/Head of School/Principal any secondary employment. It will be the responsibility of school leaders to confirm with the employee whether this conflicts with their Trust employment. Where an employee chooses to exceed an average of 48 hours per week as an employee of HCAT, for example by applying for an additional role when already working full time, advice should be sought from Trust HR who will ensure correct process is followed.
- 9.2 All employees should be clear about their contractual obligations and should not take outside employment, which conflicts with the Trust's interests.
- 9.3 An employee's declaration of secondary employment does not remove the right of the Trust to take disciplinary action against any employee whose secondary employment is deemed to be, or has been, detrimental to the interests or reputation of the Trust.
- 9.4 No work other than for the Trust should be undertaken in the workplace. This includes the use of workplace facilities unless this is with prior agreement, for example, for Trade Union Meetings.
- 9.5 Employee appointments as School Governors, Councillors to Local Authorities, membership of the Territorial Army, appointment as a Justice of the Peace or as a Member of the Employment Tribunal do not constitute secondary employment as described in this Code. Nonetheless the principles of employees making their Line Manager, Headteacher/Head of School/Principal aware of these duties and seeking appropriate time off in a reasonable and timely manner apply.
- 9.6 The Trust understands the value and importance to both individuals and the Trust of extending professional experience. Employees may be asked on occasions to give lectures or undertake work using their professional skills and expertise. If the work forms part of the duties of a post and the employee is carrying

out an official duty, they must forward all fees to their employing school or the central Trust. Any expenses incurred will be reimbursed through the normal procedures.

Employees in receipt of 'fees' in respect of undertaking work and/or lecturing to an outside organisation/persons) may retain the 'fees' provided that:

- Preparation and delivery of the work is undertaken outside working hours (unless covered below).
- Equipment and/or materials are not being provided by the Trust.
- The employee is not acting as a representative of the Trust.

Where the work or lecture is undertaken during working hours the equivalent working hours must be rearranged, in agreement with the employee's Line Manager, Headteacher/Head of School/Principal to accommodate the employee's request or time off in lieu must be used. The employee concerned may also be granted unpaid leave, subject to the agreement of the Line Manager, Headteacher/Head of School/Principal.

- 9.7 Employees of the Trust will not be permitted to hold voting rights or trusteeships of external bodies who have contracts with or are otherwise grant funded by the Trust, without the express consent of the Chief Executive Officer. There is a potential conflict of interest between an employee's responsibilities to protect the interests of the Trust and the legal duties of a Trustee or voting member of an independent organisation. It is also extremely doubtful whether employees will be covered by the Trust's indemnity in such circumstances.
- 9.8 The copyright in all records and documents made by employees during and for their employment shall belong to the Trust.

10. Other Obligations

Disclosure of Information

- 10.1 The law requires that certain types of information must be available to the Board, auditors, government departments, service users and the public.
- 10.2 Confidential, personal or financial information about any employee, such as salary details, must not be disclosed to any unauthorised person, or normally, to any external organisation/agency, without the express approval of the person concerned.
- 10.3 Where the request relates to references e.g. arising from a job or mortgage application, this information may be released after verifying the identity of the enquirer.
- 10.4 In accordance with Keeping Children Safe in Education, in an academy setting, only the Headteacher/Head of School/Principal can provide employment references.
- 10.5 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.

Information Technology and Data Security

- 10.6 Employees must ensure they familiarise themselves with the Trust's security procedures in relation to the use of computers and the proper management of computer held information. Care must be taken to observe established procedures when using passwords when logging on and off. Employees must never share passwords, which may lead to unauthorised access to Trust systems. Where this practice is found, it could lead to disciplinary action being taken. Academy or central Trust based employees must ensure they familiarise themselves with their specific IT Policies where this is covered in detail.

Use of I.T Equipment, Email and Social Media

10.7 Academy or central Trust based employees must ensure they familiarise themselves with their specific IT Policies where this is covered in detail.

Attendance

10.8 All employees are expected to attend regularly and punctually, not to absent themselves from duty without permission and to perform their duties in a manner which combines prompt and efficient service with a concern for the feelings of others, including colleagues, managers, children and members of the public. Employees must ensure they familiarise themselves with the Trust's **Supporting Attendance Policy** where this is covered in detail.

Health and Safety

10.9 In respect of Health and Safety, all relevant Policies and Procedures must be always observed. All employees are reminded that the Trust operates a no smoking policy in all its premises.

Discrimination Bullying and Harassment – Equality, Diversity and Inclusion

10.10 The Trust values variety and individual differences, and aims to create a culture, environment and practices at all levels which encompass acceptance, respect and inclusion. Employees should not themselves discriminate, induce or attempt to induce, other employees to discriminate and should not harass, abuse or intimidate other employees on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. All employees have a responsibility to discourage any forms of bullying and harassment. Employees must ensure that they familiarise themselves with the **Dignity at Work Policy** where this is covered in detail.

10.11 All members of the local community, children and their families and other employees have a right to be treated with fairness and equity. Employees should ensure that policies and practices relating to equality issues, as agreed by the Trust, are complied with in addition to the requirements of the law.

Dress and Personal Appearance

10.12 All employees act as ambassadors for the Trust and are role models to students. They must therefore maintain a professional standard of dress and appearance that is appropriate or required for the workplace and the work being undertaken. Employees must also maintain good personal hygiene.

10.13 The Trust seeks to promote diversity within its workforce and recognises the importance of cultural dress to its employees. Cultural dress is a visible sign of this commitment and employees will be supported in observing cultural dress codes within the general principals of point 9.12. Please refer to your Academy's **Dress Code**.

Criminal Convictions

10.14 The Trust requires that all employees have enhanced DBS clearance and that all convictions (spent or unspent), cautions or bind overs are declared prior to employment.

10.15 Employees whose role involves driving a Trust vehicle, or a vehicle leased by the Trust for Trust business, must declare any motoring offences to their Headteacher, including parking fines.

10.16 Employees (before or during their employment) must inform their Line Manager/Headteacher/Head of School/Principal of any pending criminal proceedings against them.

10.17 Any declarations will be recorded and placed on an employees' personal file.

Drugs and Alcohol

10.18 Employees must attend work in a fit condition to undertake their duties in a safe manner.

10.19 Any employee attending work under the influence of alcohol or drugs may be suspended, and in the case of drugs, may be reported to the police.

10.20 The drinking of alcohol and/or use of illegal drugs whilst at work may also lead to suspension from duty. Please refer to the **Substance Misuse Policy**.

10.21 (Executive) Principal /Headteacher/Head of School/Principal should refer to the **Substance Misuse Policy** which outlines that support and advice will be given to employees willing to accept help and follow a programme of rehabilitation. A failure to follow any such programme and continuing problems in the workplace will result in issues of conduct being dealt with under the **Trust's Disciplinary Procedure**.

Political Neutrality

10.22 An employee should not allow their personal or political opinions to interfere with their work.

10.23 Whilst engaged in Trust Business, employees must not wear or display on their person or vehicle, or items such as tools and equipment, overt objects indicating affiliation with or opposition to any political party or related pressure group.

11. Communications

Communication with the Media

11.1 It is the Trust policy that all media liaison relating to Trust activities is handled by the Executive Leadership Team of the Trust and the Trust Board. Any employee with Ideas for positive press coverage about the Trust's policies or activities or who is approached by a journalist must seek the approval of their Line Manager, Headteacher/Head of School/Principal before any information is given either verbally or in writing. Where the issue relates to the wider business of the Trust the approval of the Chief Executive Officer must be sought.

11.2 Where an employee is writing material for publication which does not refer specifically to the Trust, but does relate to their profession/occupation e.g., articles in professional journals, the employee, out of courtesy, should notify the Chief Executive Officer and their Line Manager, Headteacher/Head of School/Principal prior to publication.

11.3 Employees are expected to raise any concerns, including concerns of a critical nature within the Trust, directly with their Line Manager, Headteacher/Head of School/Principal. Public comments of acritical nature which could undermine the Trust, or bring the Trust into disrepute, other than those disclosed under the **Whistleblowing Policy** could be construed as a fundamental breach of trust and confidence which may have implications for continued employment. This may include comments made by employees, including managers, when participating in an outside group if such comments bring them into conflict with the Trust.

Communications - Written (General)

11.4 Employees should communicate with internal and external stakeholders of the Trust in a consistent manner, ensuring that all information is shared in a professional way. Employees should be aware that they are

representing the Trust and therefore any external communications may reflect on how the Trust is viewed in the community.

11.5 Anyone including parents and professional bodies can make a Data Subject Access Request in accordance with GDPR. This means that the Trust is obliged to give all information it holds in relation to the subject. For example, a parent could ask for all communications mentioning their child and the Trust would have a legal duty to provide this information, including internal emails where the child's name was mentioned. Anything sent in an email could be forwarded beyond the recipient without an employees' knowledge.

11.6 All communications both internally and externally must convey messages professionally and in the correct context.

11.7 Important points to follow for external communications (emails/letters):

- Consider the most appropriate form of communication - will a telephone call convey the message rather than an email? If your message is long and complicated, have a conversation rather than attempt to explain in a long email.
- Address the parent by their title e.g. Mr, Mrs, Miss, Ms etc. This will give a professional and formal context from the outset. The use of first names can give the impression of informality and may not convey the importance of the message.
- Use wording that is professional, grammatically correct and conveys the information you are imparting. If you are unsure, please ask your line manager to check the message before you send to the recipient.
- Only give the information that you need to impart, don't feel that you need to add irrelevant details to your message and don't start the message with personal questions or statements e.g. 'Did you have a good weekend?'
- Consider your tone, words can be misconstrued over email and certain words or phrases can make messages sound abrupt or demanding.
- Use an appropriate sign off to your message for example, 'Regards', 'Kind regards' or more formally 'Yours sincerely' (if appropriate) followed by your name e.g. Mr/Mrs/Ms etc. Your relationship with the recipient is a formal business relationship, they are not friends, so it is inappropriate to sign off with your first name and/or add emojis or kisses etc.
- Consider using an automated email signature to include your name, designation, work address and telephone number. This means that you will automatically sign emails in the same way for each message.
- Send an acknowledgment if you need to investigate an issue before responding fully. The recipient will then know you are dealing with the issue and can expect to receive a response within a given timescale.
- If you are away from work for any reason, use an out of office message for emails and if appropriate direct the individual to another member of the team or your line manager.

12. Use of Trust Systems, Property and Facilities

12.1 Trust property, such as telephones, mobiles, internet, email, stationary, photocopiers, laptops, PC's, tools, materials, offices, or car parks, may only be used for Trust business unless specific permission for private use is given by the Chief Executive Officer.

13. Monitoring and Review

13.1 The Equality Act 2010 requires public bodies, in carrying out their functions, to have due regard to the following:

- to eliminate discrimination and other conduct that is prohibited by the Act
- to advance equality of opportunity between people who share a protected characteristic and people who do not share it

- to foster good relations across all characteristics - between people who share a protected characteristic and people who do not share it.

13.2 In the development of this policy due regard has been given to achieving these objectives.

13.3 This procedure will be reviewed to respond to any changes in the employment legislation, and at least every three years, in conjunction with the Trust's recognised trade unions.