

## CODE OF CONDUCT

### Introduction

This Code of Conduct applies to all CEFM staff and its extended workforce and we expect all our employees to know and follow it. This Code of Conduct is complementary to CEFM's Staff Handbook. In addition, our professional employees are also bound by standards of professional conduct.

The aim of this Code of Conduct is to set a benchmark for high standards of behaviour and integrity, as well as promoting good relations with our clients.

CEFM prohibits retaliation against any employee who reports or participates in an investigation of a possible violation of this Code of Conduct.

### About CEFM

CEFM has assisted schools on financial, educational, HR and legal matters since the inception of Local Management of Schools in 1990.

We provide expert advisory services led by solicitors, accountants, occupational health managers and educational practitioners.

Our expert advisers support schools and academies in managing change through proactive helplines, consultancy and training. Our information website includes a body of knowledge written by our in-house team and provides timely, succinct updates to assist our clients through the process of change.

CEFM also administers a number of education licences, provides helplines for schools, FE Colleges and Local Authorities and acts as collection agents on behalf of licensing bodies.

CEFM is an independent company focused on supporting schools. The company is wholly owned and directly managed by the directors – we are neither part of a larger parent company nor driven by shareholders. CEFM clients benefit from direct access to the owners and decision makers ensuring they receive the level of support they need.

Whether maintained, an academy or part of a multi academy trust, it is our belief that each school is unique and requires a support package tailored to its own needs.

Factors including staff numbers, in-house expertise and new partnerships can all influence the level and type of support required.

With this in mind, we invest time listening to our clients to ensure we provide the right mix of services at a competitive price.

Schools can choose any combination of our services. It is our policy to visit each school in person to explain the services in detail to guarantee the school receives the best possible support. This service is offered without obligation.

CEFM is committed to the highest standard of ethical conduct and integrity in its business activities.

## Our staff

CEFM staff are provided with clear guidance of expectations through a comprehensive Staff Handbook.

Our employees receive relevant and on-going training to ensure their confidence and competency in their roles.

CEFM actively encourages its employees to participate in schools in a voluntary capacity, for instance as school governors or trustees. We believe that this helps its staff to have an excellent and broader understanding of the school environment.

## Respect in the workplace

CEFM is committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment and against clients.

All employees should respect their colleagues. CEFM will not allow any kind of discriminatory behaviour, harassment or victimisation. CEFM ensures that its employees understand its Equal opportunity and dignity at work policy, which can be found in the Staff Handbook.

## Work life balance

CEFM strives to provide a safe working environment and ensure the safety and wellbeing of all its employees. The company seeks to ensure that workers do not exceed reasonable working hours to provide for a satisfactory balance between work and personal life. The company is also committed to ensuring that workers' health is not compromised by the workplace. Directors have a responsibility to ensure that working hours are kept within reasonable limits and will monitor working hours for this purpose. Employees themselves also have a duty to ensure that they are not working excessive hours and inform the personnel director directly if they consider that they may be doing so.

## Commitment to our clients

We are committed to building transparent relationships by:

- Treating you fairly, honestly, reasonably, impartially and with respect.
- Being courteous and friendly whenever we are communicating with you.
- Providing you with a name whenever we speak with you.

We provide a complete support service including:

- A comprehensive proactive advisory service.
- Access to experts within the education field, who answer detailed questions regarding HR, finance and licensing issues.
- Keeping notes when clients approach CEFM for advice to ensure that members of our team access previous queries and provide consistent on-going advice if required.

## Accountability

We expect team members to take responsibility for their actions, ensuring the appropriate use of information, exercising diligence and duty of care obligations.

When acting as agent on behalf of other organisations we will, as a minimum, maintain or exceed their standards.

## **Gifts and hospitality**

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers, or other business contacts should be reported immediately to a director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for instance, where there could be a real or perceived conflict of interest. As a rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from a director is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances.

CEFM will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The company will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or a particular business benefit was being sought (for example before a tendering exercise).

CEFM allows employees and associated persons to offer corporate entertainment, gifts, hospitality and promotional expenditure that is reasonable, appropriate and proportionate and is undertaken:

- For the purpose of establishing or maintaining good business relationships.
- To improve the image and reputation of CEFM.
- To present CEFM's services effectively.

Provided that it is:

- Approved by a director.
- Arranged in good faith.
- Not offered, promised or accepted to secure an advantage for the company or any of its employees or associated persons or to influence the impartiality of the recipient.
- Recorded in the Hospitality Register.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

## **Personal information and data policies**

CEFM is legally required to be able to demonstrate compliance with the General Data Protection Regulation (GDPR). The legislation which applies is the General Data Protection Regulation 2018 (GDPR) and the Protection of Freedoms Act 2012.

CEFM, in processing personal data, ensures that all its staff are aware of the requirements of the GDPR and their respective obligations to protect the confidentiality and integrity of personal data. Failing to do so can result in significant financial penalties and sanctions to CEFM and possibly to any individual who breaches the requirements of the GDPR.

Although CEFM is not required to have a Data Protection Officer (DPO), we hold ourselves to high standards and have appointed a Data Manager who will keep CEFM up to date with current legislation and guidance. The Data Manager will be a first point of contact for any issues regarding GDPR compliance. Advice should be sought from the Data Manager regarding company policies and the day-to-day management and use of personal data. It is important to stress that this policy applies to all forms of data, including personal data, regardless of whether it is held on paper or in electronic format. The policy applies to both CEFM's own data and data we hold relating to or on behalf of clients.

We ensure the safeguarding of all confidential, commercially sensitive and personal data acquired as a result of business relationships and do not use it for personal advantage or the benefit or detriment of third parties.

Our Privacy Notice can be found on our website.

### **Competing fairly and honestly**

CEFM respects its competitors and wishes to compete with them fairly.

### **Complaints and disputes**

We are open and transparent regarding complaints raised, both internally and externally, in the approach CEFM takes when investigating and responding to allegations.

If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, please let us know by writing to Jason Foster, Director, CEFM, Red Lion House, 9-10 High Street, High Wycombe, Bucks. HP11 2AZ.

We undertake to investigate any complaint carefully and promptly and to do all we can to explain the position to you.

Signed 

Reviewed and updated: 24 February 2021