

Code of Conduct

Policy Owner: Group Head of People Operations

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Rationale

The International Schools Partnership is a leading and growing group of international schools, all of which aim to be the school of choice in their local area.

The word partnership in our name is very important to us. Above anything else, it says that we are committed to working collaboratively, listening to and learning from each other and getting better, together.

We believe strong organisations are built from respect, openness and effective teamwork and our purpose and principles set out the values that matter to us most.

Our Purpose

We are a focused, growing and financially secure group of schools. All our schools:

- Help children and students learn to levels that amaze them.
- Inspire children and students to be successful now and equip them to be successful later.
- Are truly international, working in partnerships within and across regions, cultures and languages.
- Aim to be the first choice for children, students and their families, wherever we are.

Our Principles

These emphasise and underpin how we do what we do. We:

- **Begin with our children and students;**
Our children and students are at the heart of our business. Simply, their success is our success.
- **Treat everyone with care and respect;**
We look after one another, embrace similarities and differences and promote the well-being of each other.
- **Operate effectively;**
We focus relentlessly on the things that are most important and will make the most difference.
- **Are financially responsible;**
We make financial choices carefully based on the needs of the children, students and our schools.
- **Learn continuously**
Getting better is what drives us.

Our Purpose and Principles grew from a very intentional brand personality and a set of key behaviours. This personality and ISP way of doing things should be recognisable in everything we do, whatever our role. All of us are responsible for upholding and role-modelling these standards and using the Purpose and Principles as guideposts for what we are doing and how we go about it.

Brand Personality

Learning focused	Cultural	First choice
Transparent	Ambitious	Innovative
International	Growing	Caring
Committed	Secure	Respectful
Focused	Successful	Relentless
Organised	Supportive	Creative
Responsive	High quality	Financially responsible

Key Behaviours



ISP Code of Conduct

A Code of Conduct is “a set of principles or rules that define the way in which you expect your employees to behave” (Harvard Business Review, 2019).

A Code of Conduct should always reflect an organisation’s values and our Code of Conduct at ISP is founded on our Purpose and Principles. Each of us is expected to follow and role model ISP’s Purpose and Principles; they encapsulate our approach to our work, the spirit of our interactions with each other and how we connect with others in our roles – pupils, parents, peers, suppliers, prospective parents etc.

We expect the highest standards of conduct and behaviour from our colleagues at all times. ISP colleagues are diligent, honest and ethical in the performance of their duties and devote their full time, attention and abilities to them when working. They are polite, courteous and professional, cooperating and collaborating effectively and respectfully with others. Compliance with reasonable instructions, the terms of employment contracts and ISP policies as well as any relevant regulatory, professional and legal requirements and standards is a given.

Roles and Responsibilities

The ISP Board has overall responsibility for ensuring that this Policy Statement complies with our legal and ethical obligations, and that those under ISP's control comply with it.

The British School of Almería has delegated responsibility for oversight of the implementation of this Policy Statement, and is responsible for appropriate reporting under this Policy Statement to the ISP Board, which shall be a minimum of once a year.

The British School of Almería on behalf of the ISP Board will monitor the effectiveness of this Policy Statement through regular review, and via an internal audit process. This will include an annual review of this Policy Statement undertaken by the school.

The ISP Management Board is responsible for ensuring the implementation of this Policy across the Group and delegates day to day responsibility in each Region to the Regional Managing Directors, who in turn are responsible for:

- Developing Policy Application Notes, which are fully compliant with this Policy Statement and approved by the British School of Almería;
- Keeping the Policy Application Notes under regular review, and communicating any updates;
- Ensuring each School has its own policy applicable to School Staff, which is fully compliant with this Policy Statement and the Policy Application Notes; and
- Monitoring the implementation and effectiveness of each School's policy.

All ISP Group employees in roles that may involve conduct issues must ensure that they read, understand, and comply with this Policy Statement, and the relevant supporting Policy Application Notes and School policies. The following roles are automatically deemed to involve conduct issues:

- All Regional team members;
- All Head Teachers;
- All Human Resources staff in Schools and in the regional ISP team; and
- All staff with line management responsibilities.

The Regional Managing Director must ensure that appropriate training is put in place for relevant staff, appropriate to their role and in accordance with the Policy Application Notes.

Staff are required to avoid any activity that might lead to, or suggest, a breach of this Policy Statement. If anyone is unclear on any aspect relating to the application of this Policy Statement, they should seek guidance from the Regional Managing Director for the Region or the British School of Almería.

Compliance with this Code of Conduct is the responsibility of all those working for us and under our control.

Wellbeing and safety

The health, safety and wellbeing of all our employees and students is our top priority. This includes focusing on our mental health and overall wellbeing with equal importance as our physical wellness and safety.

Each of us has a part to play in ensuring ISP and our schools are welcoming, safe, supportive and inspiring spaces for everyone to grow and develop and, in line with this, our employees are expected to take responsibility for looking after themselves and also those around them.

Further guidance on wellbeing can be found in the Group Employee Wellbeing Policy and for safeguarding employees should refer to our Child Protection and Safeguarding and Safer Recruitment Policies.

Drug and Alcohol Misuse

ISP has a duty to protect the health, safety and welfare of all its employees. However, we also recognise that, for a number of reasons, people can develop alcohol or drug-related problems. In relation to drugs, these rules apply to those substances that are unlawful under the criminal law as opposed to prescribed medication. ISP is supportive of prescribed medication and employees should follow their specific medical advice.

Even small amounts of alcohol can affect the work performance and, if an employee is found under the influence of alcohol whilst at work, the impact can range from sub-standard performance through to serious health and safety consequences for themselves and others. The same applies to being under the influence of drugs. Employees are expected to be able to carry out their role and to perform their duties and responsibilities fully and safely without any limitations.

If an employee comes to work suffering noticeably under the influence of alcohol or drugs and their work performance/the health and safety of them and / or their employees is jeopardised, they will be subject to disciplinary proceedings as incapacity or misconduct caused by an excess of alcohol or drugs at work is a potential gross misconduct offence under the relevant local disciplinary procedure. We also reserve the right in such circumstances to arrange for the employee to be escorted from ISP's premises immediately and sent home.

No non-prescribed, unlawful drugs may be brought onto or consumed on ISP premises at any time and if an employee is suspected of being in possession of or taking drugs on ISP premises or of buying or selling drugs this will be investigated appropriately under the appropriate disciplinary procedure. Employees representing ISP at business/client functions or conferences or attending ISP organised social events (either within or outside of normal working hours) are expected to be moderate if drinking alcohol and to take specific, preventative action to ensure they are well within the legal limits if they are driving. They are expressly prohibited from taking non-prescribed unlawful drugs on these occasions, as well as at all other times.

Social drinking after normal working hours and away from the ISP's premises is, of course, generally a personal matter and does not directly concern ISP. ISP's concern only arises when, because of the pattern or amount of drink involved, the employee's attendance, work performance or conduct of work deteriorates or there is a concern for the employee's welfare and wellbeing.

Employees should inform their line manager or Human Resources of any prescribed medication that may have an effect on their ability to carry out their work and must follow any instructions subsequently given.

Where a line manager considers that deterioration in work performance and / or changes in behaviour may be due to alcohol or drug misuse, they should seek advice from Human Resources. Confidentiality will be maintained appropriately but in supporting employees some degree of information-sharing may be necessary.

We recognise that a drug or alcohol problem may be an illness that needs treatment like other illnesses. We want to help protect employees from the dangers of drug, alcohol and other substance misuse and to encourage those with a problem to seek help. We will look to what support can be provided and, where appropriate, will consider suspending any disciplinary action where drug, alcohol or substance misuse is a factor, providing the employee agrees to and follows a suitable course of action or treatment.

Employees should not attempt to cover up for an employee whose work or behaviour is suffering due to an alcohol or drug-related problem.

Subject to local laws, our regions and schools reserve the right to conduct searches for alcohol or drugs on school or regional premises, including, but not limited to, searches of lockers, filing cabinets, desks, bags, clothes and packages. Any alcohol or drugs found as a result of the search will be confiscated and disciplinary action may be taken.

A breach of these provisions is a disciplinary offence and will be dealt with in accordance with ISP's disciplinary procedure. Depending on the seriousness of the offence, it may amount to gross misconduct and could result in the employee's summary dismissal.

Smoking

It is ISP policy that all schools, offices and workplaces are smoking-free. Employees are also discouraged from smoking immediately outside the entrance to premises. Smoking is permitted outside in appropriate outdoor spaces away from our premises providing the cigarettes and other materials are disposed of appropriately.

If an employee wishes to smoke, they can do so in their own time either outside their normal hours of work and during their breaks and lunch break.

Failure to comply is a disciplinary offence and will be dealt with in accordance with the relevant disciplinary procedure.

Our prohibition on smoking applies not only to employees but also to visitors to our premises and schools, including parents, clients, contractors, agency workers and suppliers.

It also applies not only to cigarettes, cigars etc. but also to e-cigarettes, personal vaporisers and electronic nicotine delivery systems.

Personal Relationships

From time to time, personal relationships may exist or develop between employees. We recognise that personal relationships can develop at any time during someone's employment as well as existing prior to them joining ISP.

All employees, irrespective of rank or role, have a responsibility to ensure that their conduct is appropriate at all times. Personal relationships at work are, on the whole, not prohibited but they must be managed with care and sensitivity; both in terms of the employees within the relationship but also with regard to colleagues working with them. Any situations that arise will be dealt with fairly

and consistently and managed appropriately to mitigate against any potential allegations of abuse of authority, bias, impropriety or conflict of interest.

Employees are obliged to make ISP aware of any relationship between themselves and another employee that might give rise to a real or perceived conflict of interest, trust or breach of confidentiality. Examples of such relationships include:

- I. close friendship, beyond normal working relationship;
- II. intimate relationship; and/or
- III. family relationship.

Employees can either inform their line manager (who will then confidentially discuss with Human Resources) or they can notify Human Resources directly. Where there is any question or doubt, employees(s) are advised to confidentially inform and seek advice from Human Resources as soon as is practically possible.

Human Resources will then confidentially consider the relationship, including any safeguard practices, consult with the relevant member of the ISP Senior Management team and inform the employee(s) if there is deemed a conflict of interest. In the event of such a conclusion, the CEO and CFO will be informed confidentially and a decision taken regarding any changes that need to be made.

As a matter of principle, there should be no employment of family members within a school or regional office without the express consent of the Divisional CEO, Divisional CFO or the Regional Managing Director. Likewise there should be no employment of family members within the ISP Central office without the express consent of the Group CEO or CFO.

It is not possible for line management relationships to continue when an intimate personal relationship exists or develops between employees in a reporting line, irrespective of whether the line management is direct or through others. This includes direct management decisions as well as additional inputs or influence, for example, in recruitment, selection, promotion or any other area where a conflict of interest might arise. We will endeavour to resolve any such conflicts by reviewing line management arrangements, team structure and / or responsibilities where possible.

Additionally, employees in a personal relationship should not work together in other circumstances where a conflict of interest, breach of confidentiality or unfair advantage might be perceived to be gained from the overlap of a personal and professional relationship.

Should a personal relationship as defined by this policy exist or develop and not be declared, then this will be considered a serious matter and may lead to disciplinary action depending on the circumstances.

Employees who feel they are being affected by a close personal relationship at work involving other employees can approach Human Resources or their line manager at all times on a without prejudice basis.

Relationships with suppliers, consultants and freelancers

No special favour should be shown during tendering processes to business run by, for example, friends, partners or relatives.

Employees who engage or supervise suppliers, consultants or freelancers or have any other work relationship with these parties and have previously had or currently have a close personal relationship

with someone who works for them, must declare that relationship to their line manager who will refer to the Group Chief Financial Officer or the relevant Divisional CFO.

Employees should refer to our Procurement Policy for further guidance and information.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Our Anti-Bribery Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Discrimination, bullying, harassment and victimisation

Together we are committed to creating and nurturing a safe, welcoming, inclusive, equitable and diverse community, representative of and responsive to different cultures and groups and where each of us has the chance to thrive, contribute and do what we do best. This commitment is set out in our Dignity at Work Policy and all colleagues should make themselves aware of this and complete our Dignity at Work micro-learning experience on the Learning Hub.

Underpinning this commitment, there needs to be a culture of mutual respect and consideration; all of us have a responsibility to embrace, support and grow this culture and to challenge those behaviours and attitudes that prevent us from achieving our goal. ISP will not tolerate discrimination, harassment, bullying or victimisation and if any employee feels that they are being subjected to such behaviour they should refer to ISP's Dignity at Work Policy and the appropriate local Grievance Procedure.

Discrimination means treating a person unfairly because of who they are or because they possess certain characteristics:

- age,
- physical and mental disability
- genetic condition or information
- nationality / national origin and citizenship
- ethnicity
- race
- religion / beliefs
- sex and sexual orientation
- marriage and civil partnership
- pregnancy
- gender / gender identity and gender reassignment
- veteran status
- part-time, fixed-term and agency workers
- union members

Bullying and harassment means any unwanted behaviour that makes someone feel intimidated, degraded, humiliated or offended. It is not necessarily always obvious or apparent to others and may happen in the workplace without an employer's awareness. Bullying or harassment can be between two individuals or it may involve groups of people. It might be obvious or it might be insidious. It may be persistent or an isolated incident. It can also occur in written communications, by phone or through email, not just face-to-face.

Victimisation broadly refers to bad treatment directed towards someone who has made or is believed to have made or supported a complaint or grievance. It includes situations where a complaint hasn't yet been made but someone is victimised because it's suspected they might make one.

Performance development

Supporting and encouraging personal development, learning and growth is key to building motivation, commitment and engagement as well as ensuring all our people are aware how they can increase their contribution to the success of their school or team.

Within ISP and our schools, respectful and professional feedback and dialogue is valued as a shared commitment to getting better, together. That is why we encourage regular 1-2-1s or check-ins between line managers and employees. The emphasis in these meetings should be on the goals or outcomes that will most benefit our schools and regions and on the quality of learning, as well as the employees' personal learning, growth and development.

Line managers and employees are also encouraged to hold personal development meetings. These provide time away from the day-to-day for managers and employees to focus on and discuss their professional and personal learning, growth and development.

Line managers and employees can find out more about our approach to Performance Development in our Performance Development Procedure and our Teacher Self-Evaluation Procedure. Locally, HR play an important role in supporting these procedures and advising and guiding our line managers.

Secondary employment policy

Employees are asked to consider carefully what impact any secondary employment may have on their ability to effectively perform their role and responsibilities with ISP or create any potential conflict of interest with that of ISP. Secondary employment should not be undertaken without the express permission of the company.

Where this has not already been indicated during the recruitment process, employees should let their manager know of any potential secondary employment in advance of agreeing to it. If any conflicts of interest arise from such employment their manager will discuss with them directly, seeking advice from Human Resources as appropriate.

Employees may not undertake any secondary employment whilst on ISP or school premises or during their ISP or school contractual hours. This includes answer phone calls or responding to emails relating to other employment.

Any other circumstances which might lead to a conflict of interest or a potential breach of the Company's confidentiality, intellectual property or inventions, should also be referred to an employee's manager. Potential conflicts might include, but are not limited to, taking part in a media interview, writing a blog piece, developing and publicising a learning theory, providing advice to third parties.

Dress code

Our guiding principle is to "dress for your day". Smart, professional presentation is therefore required for those working in our schools (including those visiting schools). This includes a uniform in those schools where it is required and appropriate clothing for other school activities e.g. Physical Education.

Within our regional offices, a tidy and smart appearance is important but there is no need for formal office wear unless meetings require it. We recognise the importance of being comfortable in and able

to show some personality through work attire. It is neither a dress up nor a dress down approach, instead we ask employees to think about what they are doing each day, who they are meeting with and where and to dress in such a way that complements this. We trust our people to use their own good sense and judgement in doing so.

Property, systems and equipment use

ISP provides employees with property, equipment and systems to support them in carrying out their roles and responsibilities to their best ability.

All property, equipment and systems provided are ISP's property and provided for the benefit of ISP. However, ISP recognise that employees need to be able to balance work and personal life and are therefore happy to permit some limited personal use in line with our Acceptable Use Policy.

All usage, whether ISP or personal, must be appropriate, responsible, proportionate and efficient and in line with ISP and local data protection requirements. Employees should refer to the Acceptable Use Policy and Data Protection Policy for further guidance.

Email etiquette

Good email etiquette should be observed at all times.

- Before sending an email, thought should be given as to whether email is the right medium in the circumstances versus a phone call, face to face conversation, meeting etc. We are often inundated with emails and other mediums may be more appropriate. Reply-all should ideally be avoided unless others will benefit from receiving the response. We should avoid contributing to system congestion by sending trivial messages, copying or forwarding emails to those who do not need to receive them.
- Emails should only be sent to intended and relevant recipients. Staff should avoid including departments, individuals and/or all staff in emails that do not directly concern them.
- Emails should contain a clear, brief subject line that summarises the purpose of the email.
- Greetings and salutations should be appropriate to the recipient and their working relationship to the sender. A signature should be included so that the recipient has the sender's contact details in case they need to follow up.
- It is important to bear in mind that people from different cultures will correspond differently and messages should be tailored accordingly.
- Tone and use of humour especially should be watched. It is very easy for tone to be misconstrued without the context of facial or vocal expressions. Exclamation marks in particular contribute to tone and should be used sparingly. Likewise, humour can also be lost in translation, particularly without the benefit of facial / vocal expressions, and there is always the risk that something one person thinks is funny is not received that way.
- Emails should always be proof-read before sending to check for any spelling, grammar and / or content errors or any potential issues with tone and humour; if something sounds abrupt when read back, it is likely not to land well when read by the recipient.
- A good tip is to only add the email address of the recipient when ready to send so that an email is not sent too soon by mistake and it is prudent to double-check the right address has been used (this is especially important where there are employees or contacts with the same or similar names).

How do I report non-compliance with the Code of Conduct?

Colleagues are encouraged to report unacceptable behaviour or conduct to their line manager in the first instance. The line manager will then decide on the best way to deal with the complaint. If the complaint concerns the line manager, colleagues can approach the line manager's manager or their local HR for advice.

The relevant, local Grievance Procedure should be used for personal complaints or concerns.

Colleagues may also raise a concern about wrongdoing under the relevant local Whistleblowing Procedure if their concern is in the public interest, meaning the issue must affect others e.g. their school, ISP, work colleagues, the student / parent community or the general public.

Addressing non-compliance with the Code of Conduct

Minor breaches or issues of non-compliance can be dealt with informally. This would usually involve the line manager speaking to the colleague to discuss their conduct and to remind them of the required standards.

As part of this, the line manager should explain where and how the colleague has not met these standards and should let the colleague know that any further breaches or areas of non-compliance or a lack of satisfactory improvement could lead to formal disciplinary action.

If the non-compliance persists or if the initial issue or breach is sufficiently serious, the formal disciplinary procedure can be used. In these cases, the line manager should refer to local HR for advice and guidance before proceeding to ensure that they are following local good practice and employment legislation.

The formal disciplinary procedure is used to address issues of unacceptable conduct, punctuality and attendance and other concerns with employee behaviour. This includes issues of serious and gross misconduct. The following offences are examples of misconduct:

- Breaches of our policies or failure to follow our processes and procedures;
- Breaches of the employment contract;
- Damage to, or unauthorised use of, our property;
- Persistent poor timekeeping;
- Persistent or unauthorised absenteeism
- Time wasting, dereliction of or shirking of or non-compliance with responsibilities;
- Refusal to follow reasonable instructions;
- Excessive use of our telephones for personal calls;
- Excessive personal e-mail or internet usage;
- Negligence in the performance of duties;
- Smoking in no-smoking areas;
- Uncivil or abusive behaviour;
- Bullying or abuse to other employees; or
- Sexual, racial or other harassment.

These offences are not exclusive or exhaustive and offences of a similar nature will be dealt with under the relevant disciplinary procedure.

Serious or Gross Misconduct

Serious or gross misconduct relates to serious acts of misconduct that may result in immediate dismissal. The following is a non-exhaustive list of possible examples of serious or gross misconduct:

- Fraud, forgery or other dishonesty, including fabrication of expense claims;
- Serious breach of confidentiality, either through misconduct or negligence;
- Actual or threatened violence, or behaviour which provokes violence;
- Deliberate damage to our buildings, fittings, property or equipment, or the property of a pupil, employee, contractor, customer or member of the public;
- Serious misuse of our property or name (either of ISP or any school);

- Deliberately accessing internet sites containing pornographic, illegal, offensive, immoral or obscene material;
- Repeated or serious failure to obey instructions, or any other serious act of insubordination;
- Conduct that could bring ISP or our schools into serious disrepute;
- Breach of our Child Protection and Safeguarding Policy;
- Breach of our Modern Slavery Policy;
- Being under the influence of alcohol, drugs or other substances during working hours;
- Causing loss, damage or injury through serious negligence;
- Serious or repeated breach of health and safety rules or serious misuse of safety equipment;
- Unauthorised use or disclosure of confidential information or failure to ensure that confidential information is kept secure;
- Accepting or offering a bribe or other secret payment;
- Accepting a gift above nominal value from a pupil, parent, supplier, contractor or other third party in connection with employment without the prior consent of the line manager;
- Conviction for a criminal offence that in our opinion may affect our reputation or our relationship with our staff, customers or the public, or otherwise affects your suitability or ability to continue to work for us;
- Possession, use, supply or attempted supply of drugs;
- Serious neglect of duties, or a serious or deliberate breach of your contract or operating procedures;
- Knowing breach of legislative, statutory or regulatory rules affecting your work;
- Unauthorised use, processing or disclosure of personal data contrary to our Data Protection Policy;
- Bullying / harassment of, or discrimination against, employees, contractors, pupils or parents;
- Refusal to disclose any of the information required by the nature of employment or any other information that may have a bearing on the performance of duties;
- Lying, misrepresentation or the deliberate withholding of material information on a CV or application for employment;
- Giving false information as to qualifications or entitlement to work in order to gain employment or other benefits;
- Making a disclosure of false or misleading information under our Whistleblowing Policy;
- Making untrue allegations in bad faith against an employee;
- Serious misuse of our information technology systems (including misuse of developed or licensed software, downloading of or use of unauthorised software and misuse of e-mail and the internet);
- Undertaking unauthorised paid or unpaid employment during working hours; or
- Unauthorised entry into an area of the premises which is prohibited.

These examples are not exhaustive or exclusive and offences of a similar nature will be dealt with under the appropriate local disciplinary procedures.

Serious or gross misconduct may result in immediate dismissal in line with relevant country employment legislation. Dismissal will be notified in writing.