

Queen's Park Trust

Revision v1.0, dated 2nd May 2026



Code of Conduct

Breaching this code could result in the removal of a trustee or committee member. This model code is provided as a base for trusts to use as part of their governance and assurance work. It includes both individual and corporate commitments and reflects the needs of good governance for trusts both as charities and organisations responsible for the spending of public funds.

Model code Trustees and committee members individually commit to:

- Attend meetings – and be committed, accountable and active;
- Uphold the values and decisions of the trust and be an ambassador for the trust in all aspects of public and personal life, including social media;
- When undertaking duties as a trustee, ensure that anything that is said or written reflects the policies of the trust (even where this is different to private views);
- Observe confidentiality;
- Avoid conflicts of interest and where a conflict arises, declare any interests in proposed transactions or arrangements (including those related to people with whom we are connected);
- When undertaking duties as a trustee, work collaboratively and corporately with other trustees to fulfil the obligations of board membership;
- When undertaking duties as a trustee, understand the responsibilities of trustees as directors under company law and trustees under charity law;
- Promise to be the guardian of the charitable objects (the purpose) of the trust;
- Fulfil the expectations of a good employer and the contract of trust between the employer and those who are employed;
- Keep informed about the trust, its strengths, challenges and opportunities, its connection to and relationship with the residents, organisations and communities it serves;
- Hold the executive to account in a respectful and purposeful way;
- Selflessness: all our decisions are taken in the public interest
- Integrity: we will not act or take decisions in order to gain financial or other material benefits for ourselves, our family, or our friends
- Objectivity: our decisions are taken impartially, fairly and on merit, using the best evidence and without discrimination or bias
- Accountability: we are comfortable submitting ourselves to external scrutiny
- Openness: we take decisions in an open and transparent manner
- Honesty: we are truthful in our actions, decisions and reporting
- Leadership: we demonstrate the highest standards of public life in our individual and corporate behaviour

We expect you to act professionally when working with a relative or with someone with whom you are in a personal relationship with and not allow your relationship to disrupt the workplace or interfere with your work or judgement. You should seek advice if there are any problems.

Gifts Hospitality & Sponsorship

The Local Govt Act 1972 states that an employee shall not “under colour of his office or employment accept any fee or reward other than their proper remuneration (i.e. salary/ pay)”

Therefore, you must not accept any fee or reward for work done undertaken for the Trust other than your pay and allowances as set out in your contract of employment without seeking prior approval.

If you have been invited by an outside organisation to attend a hospitality event, including but not limited to, breakfast, lunch, dinner, sporting event, seminar/conference, social or cultural event, and you wish to accept the offer, your acceptance must be authorised in advance by a board member.

You must not accept hospitality from any organisation that is likely to result in a conflict of interest in respect of decisions made by the trustees, and other officers. This also applies where the invitation is considered to be personal but arises from a link with an organisation/contractor as a consequence of your role within the trust.

Any employee that is authorised to accept hospitality must remember that they are representing the trust and that all terms and conditions of service still apply. It is an offence under the Bribery Act 2010 to accept gifts loans, fees, or rewards as an inducement to act in a certain way in your official capacity.

You must not accept payment from a third party that is known to be or suspected to be, offered with the expectation that it will obtain a business advantage or where such a business advantage will be provided in return by the trust. You must be particularly sensitive to the timings of offers of gifts or hospitality in relation to decisions that the trust may have taken, or be about to take, which affect those providing the gift or hospitality.

A one-off gift of a low nominal value (less than £25) will generally be authorised for acceptance provided it does not compromise your position, or that of the trust. With regards to high value or regular gifts/offers of hospitality, it must be demonstrated there is a genuine business reason and/or need to accept any such offer.

If an external organisation wished, or is sought to sponsor a trust activity, the rules concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors. Where the Council wishes to sponsor an event, or service, employees or members of an employee’s family must not benefit until

full disclosure of interest has been made and approved in advance by a member of the board.

The trust will not tolerate any instances of bribery, corruption, fraud, or theft. This includes;

Abuse of position and will result in disciplinary action and may also result in criminal proceedings against you.

Contract and procurement fraud, both internal and external, is not acceptable under any circumstance.

You must act with integrity and honesty in all your business activities, and you must be particularly vigilant if your role involves any of the following:

- Raising requisitions for goods and services;
- Authorising the procurement of goods and services;
- Writing of specifications or reviewing tenders for the supply of goods and services;
- Contract management or monitoring or;
- Amending or creating suppliers or customers in Business World.

Working with Contractors

If you have a relationship or a business, of private nature with external contractors, or potential contractors, this must be disclosed to the appropriate manager.

Orders and contracts must be awarded on merit and by fair competition against other tenders. No special favours should be shown to business operated or controlled by, for example, friends, partners, or relatives in the tendering process.

Public Comment on Council Policy and Administration

It is important that enquiries from the news media are properly handled in order to maintain effective public relations and to protect the trust's reputation. As such, Employees must not deal directly with the press or the media unless required to do so in the course of their work or they have been expressly authorised by the team. Approaches from all press, radio, TV stations or specialist press for information or comment on issues affecting the work of the trust must be referred to the team, who will discuss the nature of the story and then contact the appropriate officer or member asking them to respond. Any article, publication, or interview given on aspects of trust policy or activity must be properly authorised.

Any invitations to undertake lectures or presentations at conferences or seminars in the public domain, or any literature being produced for publication concerning any trust matter must be authorised by the team.

It is important that no financial information is released by any employee.

Use of Social Media Accounts

You should be aware that social networking websites are public forums, and you should not assume that your entries will remain private. When communicating via social media you must not conduct yourself in a way that brings the trust or any employee or councillor into disrepute or disclose information that is confidential to the trust. If you do, even if your social media is a personal site, disciplinary action can still be taken, up to and including dismissal.

You must not use your personal social media sites when conducting work for the trust.

Side Deals or Side Letters

All the terms and conditions of agreements entered into by the trust, must be formally documented. Contract terms and conditions define the key attributes of the trust's rights, obligations, and liabilities and can also dictate the accounting treatment given to a transaction.

Making business commitments outside the formal contracting process, through side deals, side letters, or otherwise is unacceptable. You must not make any oral or written commitments that create new agreements or modify existing agreements without obtaining approval through the formal contracting process.

Political Activities

You must ensure that your right to engage in political or professional activities does not result in an actual or perceived conflict of interest with your work and you should ensure that you are able, and be seen to be able, to remain unbiased in the performance of those duties. You must not allow your own personal or political opinions to interfere with your work and you must not use the trust assets (including work time, premises, equipment, or funds) to personally support candidates to campaigns.

Working with Members of Council

You must treat all political groups and individual Councillors equally, fairly and remain politically neutral at all times. You must provide professional, impartial, and effective support, to enable Councillors to fulfil their role, in and on behalf of, the trust.

You must not seek to influence or lobby a Councillor with regard to personal issues.

Trade Union Representatives

If you are a workplace representative of a trade union or a professional association, you must ensure that when you make a public comment, it is clear that any such comment is made on behalf of the union or association you represent and not the trust.

Closed Organisation

If you are a member of any organisation that is not open to the public and in respect of which secrecy about rules or membership or conduct exists you must disclose this to the board.

Community Activities and Public Positions

The trust complies with all relevant laws and regulations and operates in ways that benefits the communities in which it serves. We encourage you to uphold this commitment to the community and your activities. If you hold an elected or appointed public office while employed at the trust you must disclose it. It is important that you do not get involved in any decisions that might create or appear to create a conflict of interest.

Criminal Charges, Convictions and Misconduct

You must conduct yourself in a professional manner at all times at work. Serious misconduct and/or criminal offences committed during or outside of working hours which bring you, or the trust into disrepute may be the subject of disciplinary action which could lead to dismissal. The trust requires all applicants for jobs to disclose all contraventions of, or failures to comply with, any provisions of law, whether committed in the UK or elsewhere, unless the Rehabilitations of Offenders Act applies, and the rehabilitation period has expired. In some circumstances, Disclosure and Barring Service (DBS) checks may be conducted on successful applicants for certain positions.

Once you are an employee, you must notify the trust in writing if you are charged with any criminal offence, or if you are convicted of any offence. If you are charged with an offence, the notice must be given immediately after you are charged (i.e. the next working day). If you are convicted of an offence, the notification must be given immediately after you are convicted (i.e. the next working day). It should be noted that the term “conviction” includes a finding of guilt regardless of whether a conviction is recorded. Failure to notify the trust in either case will constitute grounds for disciplinary action.

Internal Audit, Counter Fraud and Risk and Opportunity Management

Reporting Breaches of the Code and Whistleblowing

If you are concerned about any practice you see in the trust which you think conflicts with the Code of Conduct, you should obtain advice from an appropriate person.

The Public Interests Disclosure Act 1998 and Council Whistleblowing Policy can provide safeguards for employees and public officials who disclose unlawful and improper conduct including breaches of this Code.

Please refer to the Whistleblowing Policy.

Social Media Guidelines

There is often a fine line between the use of social media as a work tool and your personal use as an individual outside of your work role. Sometimes your opinions may conflict so you must take care to separate the two when that happens.

The trust recognises that many employees make use of social media in a personal capacity. While you may not be acting on our behalf, you must be aware your actions can damage the trust if you're recognised as being one of our employees.

If you use social networks or blogs for personal use and have indicated that you work at the trust, you should consider using a disclaimer that states that opinions on this site are

your own. An example: 'The views expressed are my own and don't reflect the views of my employer.'

When posting on social media you should:

1. Always be mindful of the impact your contribution might make to our reputation.
2. Remember you are personally responsible for all content you publish.
3. Not upload, post or forward any content that is abusive towards your colleagues, members of the public or the trust as an organisation. It could result in disciplinary action if you do. This includes any content that is abusive, obscene, discretionary, harassing, derogatory or defamatory.
4. Never disclose commercially sensitive, anti-competitive, private, or confidential information. Also, do not breach copyright, for example by using someone else's images or written content without permission.
5. Be aware that what you publish will be around for a long time so consider the content carefully and also be sensible about disclosing sensitive details.
6. Remember that social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions.
7. Be conscious that our reputation is made by your behaviour. Everything you publish reflects how we are perceived. Please ensure you're aware of our values and reflect these.
8. Ensure that if you identify that inaccuracies about the trust have been published in a public forum, you may politely and sensitively point out the factual inaccuracies but should refrain from entering into a debate. You should also advise the team that you have identified information that is inaccurate or could damage our reputation.
9. Ensure compliance with data protection legislation – for example moving the discussion to private message (Facebook) or direct message (Twitter) when personal details need to be discussed. Alternatively, ask them to contact us another way e.g. telephone.
10. Block, hide or ban abusive users.
11. Pay particular attention during the pre-election periods, when special care needs to be taken to ensure that any content you post, share or like is not seen as promoting any political group or individual candidate.
12. Consider the privacy settings on your social media accounts if you are in a public facing role where your name may be published as part of your job. Consider limiting access to your profiles so that people cannot look up your personal accounts and information.

Approval and review

Policy Approved by:	Ray Lancashire
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