



Staff code of Conduct

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1. Aims, Scope and Principles

This Code of Conduct sets out the standards of professional behaviour and conduct expected of everyone working for EMLM. It provides a framework to support staff in carrying out their duties with integrity, professionalism and accountability, ensuring that the highest standards are maintained at all times.

EMLM is committed to providing an environment that is safe, inclusive, respectful, supportive and conducive to learning and working. Every member of staff contributes to creating a culture where learners can thrive and where colleagues, parents, carers and visitors are treated with dignity and respect.

All staff occupy positions of trust and are expected to act as positive role models for learners. This includes demonstrating consistently high standards of behaviour, maintaining appropriate professional boundaries, exercising sound judgement, and acting in a manner that safeguards and promotes the welfare of children and young people.

As an employee of EMLM, each individual has a responsibility to uphold the reputation of the organisation and to maintain public confidence in its services. Staff are expected to conduct themselves in a manner that reflects EMLM's values and professional expectations, both during and, where relevant, outside working hours where their conduct may affect their professional role or the reputation of EMLM.

This Code reflects the expectations set out within the Teachers' Standards (where applicable), the statutory safeguarding guidance *Keeping Children Safe in Education*, the *Nolan Principles of Public Life*, and other relevant legislation and professional guidance. Whilst some standards apply specifically to teachers, the principles of honesty, integrity, accountability, respect, professionalism and safeguarding underpin the conduct expected of all employees, governors, trustees, agency workers, contractors, volunteers and anyone working on behalf of EMLM.

Everyone associated with EMLM is expected to communicate and behave with professionalism, courtesy and respect. We are committed to fostering a culture that promotes equality, diversity and inclusion, values difference, and does not tolerate discrimination, harassment, bullying or victimisation in any form.

The purpose of this Code is to:

promote high standards of professional conduct and ethical behaviour;

- safeguard and promote the welfare of learners;
- support a positive, respectful and inclusive working environment;
- maintain public confidence in EMLM and the education profession; and
- provide staff with clear expectations regarding their professional responsibilities.

All staff are required to read, understand and comply with this Code of Conduct and with related policies and procedures. The Code forms part of the induction process for all new staff and will be reinforced through ongoing training and professional development.

Staff are expected to seek advice from their line manager, senior leaders, Human Resources or the Designated Safeguarding Lead where they are unsure how the Code applies in a particular situation.

Failure to comply with this Code, associated policies or relevant statutory guidance may result in action being taken under EMLM's disciplinary procedures and, where appropriate, referral to external regulatory or safeguarding bodies.

This Code cannot cover every circumstance that may arise. Staff are therefore expected to exercise professional judgement, act in the best interests of learners, and seek advice whenever they are uncertain. If in doubt, ask.

2. Related Policies and Guidance

In accordance with the current statutory safeguarding guidance, including *Keeping Children Safe in Education (KCSIE)*, EMLM maintains a Staff Code of Conduct as part of its wider safeguarding framework. This Code should be read alongside the organisation's related policies and procedures, including those covering low-level concerns, managing allegations against staff, whistleblowing, acceptable use of technology (including mobile and personal devices), online safety, staff-learner relationships and professional boundaries, communications with learners and parents/carers (including the use of social media and digital platforms), staff relationships at work, safeguarding and child protection, confidentiality, data protection, and disciplinary procedures.

These policies are designed to support safe working practices, promote professional conduct, maintain appropriate boundaries, safeguard learners, and ensure that concerns about the welfare of children or the behaviour of adults working with children are recognised, reported and managed appropriately.

All staff are expected to be familiar with, and comply with, this Code and all associated policies. Failure to do so may result in disciplinary action and, where appropriate, referral to relevant safeguarding agencies or professional regulatory bodies.

3. Professional Conduct and Behaviour

All staff are expected to demonstrate the highest standards of professional conduct and behaviour at all times. As trusted adults and role models, staff have a significant influence on learners and are expected to model the values and behaviours that support a safe, respectful and inclusive learning environment.

Staff will:

- maintain high standards of attendance, punctuality and reliability;
- act with honesty, integrity, professionalism and accountability in all aspects of their work;
- treat all learners, colleagues, parents, carers, governors, trustees, volunteers and visitors with dignity, courtesy and respect;
- foster an inclusive environment by promoting equality, diversity and respect, and by challenging discrimination, bullying, harassment and inappropriate behaviour;
- demonstrate respect for democracy, the rule of law, individual liberty, and mutual respect and respect for those with different faiths, beliefs and backgrounds;
- ensure that personal beliefs, opinions or views are not expressed in ways that exploit learners' vulnerability, compromise professional impartiality, discriminate against others, or encourage unlawful or inappropriate behaviour;

- maintain appropriate professional boundaries with learners at all times;
- communicate respectfully and professionally, both in person and through digital and online platforms;
- act in accordance with statutory safeguarding responsibilities and maintain an attitude that safeguarding is everyone's responsibility;
- understand and comply with the statutory, regulatory and professional frameworks that apply to their role, together with all EMLM policies and procedures; and
- take personal responsibility for maintaining public confidence in EMLM through their conduct both within and, where relevant, outside the workplace.

4. Safeguarding

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff have a duty to safeguard learners, act in their best interests and maintain an attitude of "it could happen here" when considering safeguarding concerns. Staff must always act promptly where they have concerns about the welfare of a learner or the behaviour of an adult working with children.

Staff are expected to be familiar with and comply with EMLM's Safeguarding and Child Protection Policy, staff safeguarding procedures, the Staff Code of Conduct, and all relevant statutory guidance, including Keeping Children Safe in Education (KCSIE) and the Prevent Duty.

All staff must:

- recognise and respond appropriately to signs and indicators of abuse, neglect, exploitation and harm;
- report any safeguarding concern immediately in accordance with EMLM's safeguarding procedures;
- understand the role of the Designated Safeguarding Lead (DSL) and deputies;
- maintain appropriate professional curiosity and record concerns accurately and without delay;
- Report concerns about the conduct of adults working with children in accordance with the Low-Level Concerns Policy or the Managing Allegations Against Staff Policy, as appropriate; and
- complete all mandatory safeguarding and Prevent training and keep their knowledge up to date.

Safeguarding policies and procedures are available via the EMLM staff intranet/SharePoint, the organisation's website and from the school office. All new staff will receive safeguarding information as part of their induction.

4.1 Online Safety and Digital Conduct

Safeguarding responsibilities apply equally within online environments. Staff are expected to create and maintain safe, respectful and inclusive digital learning environments, whether working on site, remotely or through blended learning arrangements.

Staff must use digital technologies responsibly and professionally and comply with the Acceptable Use of Technology Policy, Online Safety Policy, Data Protection Policy and all

guidance relating to the use of mobile devices, personal devices, social media, artificial intelligence (AI) tools and electronic communications.

Professional boundaries must be maintained at all times when communicating with learners, parents and carers through digital platforms. Staff must ensure that any online communication is appropriate, authorised and undertaken using approved EMLM systems wherever possible.

4.2 Speaking Up and Whistleblowing

EMLM is committed to fostering an open, transparent and supportive culture in which staff feel confident to raise concerns without fear of victimisation or detriment.

Staff have a professional responsibility to report any concerns where they reasonably believe there may be:

- unlawful conduct or a failure to comply with a legal or statutory obligation;
- safeguarding failures or risks to the health, safety or welfare of learners, staff or others;
- fraud, financial malpractice or misuse of public funds;
- misconduct, malpractice or breaches of EMLM policies;
- attempts to conceal any of the above.

Concerns should be raised promptly in accordance with the Whistleblowing Policy. Normally, concerns should be reported to the Headteacher or another appropriate senior leader. Where the concern relates to the Headteacher, or where it is believed they may be involved, concerns should be reported to the Chair of Governors/Trust Board, or through the alternative reporting routes set out in the Whistleblowing Policy.

Wherever possible, concerns should be raised in writing, providing sufficient detail to enable the matter to be considered and investigated appropriately. All concerns raised in good faith will be taken seriously and handled confidentially, in accordance with EMLM's policies and applicable legislation.

5. Staff-Learner Relationships and Professional Boundaries

All staff are responsible for maintaining appropriate professional boundaries with learners at all times. Staff occupy positions of trust and must ensure that all relationships with learners are professional, transparent, appropriate and focused solely on supporting their education, wellbeing and safeguarding.

Staff must always consider how their behaviour may be perceived by others and avoid any conduct that could be misinterpreted, compromise professional boundaries or undermine public confidence in EMLM. Staff must recognise the inherent power imbalance between adults and children and must never misuse or abuse their position of trust.

5.1 One-to-One Working

EMLM recognises that one-to-one working is often an essential part of teaching, learning, pastoral support, SEND provision, safeguarding and therapeutic interventions. Such work should be undertaken in a manner that safeguards both the learner and the member of staff. Where one-to-one working takes place, staff should:

- ensure the location is appropriate, safe and, wherever practicable, visible to others (for example, through observation panels or open doors where appropriate);
- ensure colleagues or managers are aware that the session is taking place where this would not compromise the learner's welfare or confidentiality;
- follow any agreed recording or risk assessment procedures applicable to the activity;
- maintain appropriate professional boundaries and avoid unnecessary physical contact;
- keep a factual record where discussions relate to safeguarding, welfare or other sensitive matters; and
- seek advice from the Designated Safeguarding Lead (DSL) or a senior leader if they are concerned that a situation could place themselves or a learner at risk.

5.2 Transporting Learners

Transporting learners should only take place where it is necessary, authorised and in accordance with EMLM's educational visits, safeguarding and transport procedures.

Staff should not routinely transport learners in their own vehicles. Where exceptional circumstances make this necessary, prior authorisation should be obtained wherever possible, an appropriate risk assessment should be completed, parents or carers informed where appropriate, and the journey should be properly recorded. Staff should never place themselves or a learner in a situation that could compromise safeguarding or professional boundaries.

5.3 Contact outside the Educational Setting

Staff must maintain clear professional boundaries outside the workplace.

Unless it forms part of an authorised educational activity or there are exceptional safeguarding reasons, staff must not:

- arrange to meet learners socially;
- exchange personal contact details with learners;
- communicate with learners through personal social media accounts, messaging services or other personal communication platforms; or
- establish relationships with learners that extend beyond appropriate professional boundaries.

Communication with learners and parents/care should only take place through approved EMLM communication systems and in accordance with the Acceptable Use of Technology, Online Safety and Social Media Policies.

5.4 Professional Boundaries

Staff must ensure that their behaviour consistently reflects their professional responsibilities and maintains public confidence in EMLM.

Staff must:

- always maintain clear professional boundaries;
- avoid favouritism or behaviour that could be perceived as grooming, inappropriate or exploitative;

- ensure that any physical contact with learners is appropriate, proportionate, necessary for the circumstances and consistent with safeguarding guidance;
- declare any existing relationships or connections with learners or families that could give rise to an actual, potential or perceived conflict of interest;
- report any incident, concern or interaction that could be misinterpreted or place themselves or a learner at risk, in accordance with the Low-Level Concerns Policy or safeguarding procedures; and
- never develop, encourage or engage in inappropriate emotional, intimate, romantic or sexual relationships with learners. Such conduct is likely to constitute gross misconduct and may also amount to a criminal offence or require referral to external safeguarding or professional regulatory bodies.

Any concerns regarding professional boundaries, inappropriate behaviour or safeguarding should be reported immediately in accordance with EMLM's Safeguarding and Child Protection Policy, Low-Level Concerns Policy or Managing Allegations Against Staff Policy, as appropriate.

6. Communication, Social Media and Digital Conduct

Staff are expected to use all forms of communication, including digital technologies and social media, responsibly and professionally. Their conduct online should reflect the same high standards expected within the workplace and must not undermine public confidence in EMLM or compromise the safety or wellbeing of learners, colleagues or the organisation.

Staff must always maintain appropriate professional boundaries and ensure that all communication with learners and parents/carers is appropriate, transparent and undertaken through approved EMLM communication systems.

Staff must:

- use only authorised EMLM communication platforms when communicating with learners and parents/carers, unless there is a legitimate and authorised safeguarding or operational reason to do otherwise;
- ensure that personal social media accounts are kept separate from their professional role and make appropriate use of privacy and security settings;
- not accept or initiate friend requests, follows or other personal online connections with current learners through personal social media or messaging platforms;
- not use personal email accounts, telephone numbers or messaging applications to communicate with learners unless expressly authorised in exceptional circumstances;
- never use digital communication to develop personal relationships with learners or their families or communicate in a manner that could be considered inappropriate, unprofessional or outside established professional boundaries;
- not search for, access or monitor learners' or parents'/carers' personal social media accounts unless there is a legitimate safeguarding or professional reason and this is undertaken in accordance with EMLM procedures;
- ensure that any concerns identified through online activity are reported in line with safeguarding procedures;

- not post, share or publish photographs, videos or personal information relating to learners without appropriate authorisation and in accordance with EMLM's Data Protection, Online Safety and Photography policies;
- ensure that any references to EMLM, colleagues, learners, parents/carers or school business made online are respectful, accurate and do not bring the organisation into disrepute; and
- comply with EMLM's Acceptable Use of Technology, Online Safety, Social Media and Data Protection policies when using digital technologies, including artificial intelligence (AI) tools.

Staff should remember that information shared online, even where privacy settings are applied, may become public. They are therefore expected to exercise professional judgement before posting or sharing content and to ensure that their online presence is consistent with their professional responsibilities and the values of EMLM.

Any concerns regarding inappropriate online communication or breaches of professional boundaries should be reported promptly in accordance with EMLM's safeguarding, low-level concerns or disciplinary procedures, as appropriate.

7. Acceptable use of technology

EMLM is committed to ensuring that technology is used safely, securely and responsibly to support teaching, learning and the effective operation of the organisation. All staff are expected to comply with the Acceptable Use of Technology Policy, Online Safety Policy, Data Protection Policy and any associated guidance relating to the use of digital systems and devices.

Staff must use EMLM's information and communication technology (ICT) systems responsibly and take reasonable steps to protect the confidentiality, integrity and security of information and systems. This includes complying with cyber security requirements, using strong passwords and multi-factor authentication (where provided), protecting devices from unauthorised access, and reporting any actual or suspected data breaches, phishing attempts or cyber or cyber security incidents immediately.

Staff must not use EMLM's ICT systems, networks, devices or internet access to access, create, store or distribute material that is unlawful, offensive, discriminatory, extremist, obscene, sexually explicit or otherwise inappropriate, or for any activity that could bring EMLM into disrepute or compromise the safety and wellbeing of learners or staff.

The use of artificial intelligence (AI) tools and emerging technologies must be lawful, ethical and in accordance with EMLM's policies and guidance. Staff must not input confidential, personal or commercially sensitive information into publicly available AI platforms unless this has been explicitly authorised and complies with data protection requirements.

Personal devices should only be used in accordance with EMLM's policies. Personal mobile phones, smart devices, cameras or other recording equipment must not be used to photograph, record or store images, audio or video of learners, except where specifically authorised for educational or safeguarding purposes using approved EMLM systems and procedures.

Limited personal use of EMLM equipment may be permitted where authorised by policy and where it does not interfere with professional responsibilities, compromise security or breach this Code of Conduct.

EMLM reserves the right, in accordance with applicable legislation and its policies, to monitor, filter, log and audit the use of its ICT systems, devices, networks, email and internet services to protect users, ensure compliance with legal and regulatory requirements, safeguard learners, maintain cyber security and investigate suspected misuse. Staff should have no expectation of privacy when using EMLM systems beyond that provided by law.

8. Confidentiality

In the course of their work, staff may have access to confidential, sensitive or personal information relating to learners, families, colleagues and the organisation. Such information must be handled lawfully, securely and in accordance with EMLM's Data Protection, Confidentiality and Safeguarding policies, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Staff must:

- access, use and share information only where there is a legitimate professional need and they are authorised to do so;
- always protect the confidentiality and privacy of personal information;
- ensure that confidential information is stored, transmitted and disposed of securely;
- exercise care when discussing confidential matters to prevent unauthorised disclosure; and
- report any actual or suspected data breach or loss of confidential information immediately in accordance with EMLM procedures.

Confidential information must never be:

- disclosed to unauthorised individuals;
- used for personal gain or to disadvantage, humiliate, intimidate, embarrass or blackmail another person;
- accessed out of curiosity or without a legitimate business need; or
- used for any purpose other than that for which it was obtained or where there is another lawful basis for processing.

The duty of confidentiality does not prevent staff from sharing information where this is necessary to safeguard or promote the welfare of a child, comply with a legal obligation or protect an individual from harm. Where there is a safeguarding concern, staff must share information promptly with the Designated Safeguarding Lead (DSL) or the appropriate statutory agency in accordance with EMLM's Safeguarding and Child Protection Policy and current statutory guidance. Staff should never promise a learner that they will keep information secret where doing so could place the learner or another person at risk of harm.

9. Honesty, Integrity and Conflict of Interest

All staff are expected to uphold the highest standards of honesty, integrity and professional conduct in all aspects of their work. Staff must act in accordance with the Nolan Principles of Public Life—selflessness, integrity, objectivity, accountability, openness, honesty and leadership—and ensure that their actions maintain public confidence in EMLM.

Staff must:

- act honestly, fairly and impartially in all professional activities;
- use EMLM's funds, property, equipment, information and resources responsibly, lawfully and only for authorised purposes;
- ensure that public and organisational resources are used efficiently and represent value for money;
- declare any actual, potential or perceived conflict of interest that could influence, or be seen to influence, their professional judgement or decision-making; and
- immediately report any suspected fraud, financial irregularity, bribery, corruption, theft, misuse of resources or other dishonest conduct in accordance with EMLM's Whistleblowing Policy

9.1 Gifts, Hospitality and Benefits

Staff must not solicit or accept gifts, hospitality, rewards or other benefits that could reasonably be perceived as influencing, or intended to influence, professional judgement or create an obligation.

Occasional hospitality associated with professional meetings, conferences, training events or official functions, and modest seasonal or celebratory events attended in a professional capacity, are generally acceptable. Where there is any doubt, staff should seek advice from the Headteacher or an appropriate senior leader before accepting any gift or hospitality.

Modest tokens of appreciation from learners, parents/carers or external organisations (for example, at the end of the school year, at Christmas or following a significant event) may be accepted where they are of nominal value, are offered openly, and could not reasonably be perceived as an inducement or reward.

Staff must:

- declare gifts, hospitality or benefits where required by EMLM's financial procedures or Register of Interests;
- decline and report any gift or offer that could reasonably be perceived as a bribe, inducement or attempt to secure preferential treatment;
- ensure that any gifts given to learners are of nominal value, form part of an approved EMLM reward or recognition scheme, are awarded fairly and consistently, and are never based on favouritism or personal relationships; and
- exercise professional judgement and transparency whenever accepting or offering gifts or hospitality.

Cash, cash equivalents or gifts of significant value must not be accepted from learners, parents/carers, contractors or suppliers.

9.2 Conflicts of Interest and Outside Employment

Staff must disclose any financial, business, personal or other interests that could conflict with, or appear to conflict with, their responsibilities to EMLM. This includes relationships, external appointments, business interests or decision-making that could compromise professional impartiality.

Staff undertaking secondary employment, consultancy, self-employment, voluntary work or holding positions in other organisations must ensure that these activities:

- do not conflict with their duties or contractual obligations to EMLM;
- do not adversely affect their health, wellbeing, attendance or performance;
- do not create safeguarding concerns or reputational risks; and
- comply with the requirements of their contract of employment.

Where there is any uncertainty, staff must seek approval from the Headteacher or other authorised manager before undertaking additional employment or activities.

Staff are required to complete and maintain declarations of business interests and other relevant declarations in accordance with EMLM's governance and financial procedures.

9.3 Reporting Concerns

Staff who become aware of dishonesty, fraud, financial malpractice, misuse of resources or any other improper conduct have a professional responsibility to report their concerns promptly through the appropriate management or whistleblowing procedures. Concerns raised in good faith will be treated seriously and in accordance with EMLM's Whistleblowing Policy.

11. Dress and Appearance

Staff are expected to present themselves in a manner that is professional, appropriate to their role and reflects positively on EMLM. Dress and personal appearance should support a safe, respectful and inclusive learning environment and maintain public confidence in the organisation.

Staff should ensure that:

- clothing is clean, tidy, appropriate to their duties and suitable for the activities being undertaken;
- dress and appearance are consistent with maintaining professional standards and appropriate relationships with learners;
- clothing is not excessively revealing, offensive or likely to cause embarrassment or distraction;
- clothing, jewellery and footwear are suitable for the working environment and comply with relevant health and safety requirements;
- clothing or accessories do not display offensive, discriminatory, extremist or inappropriate wording, images or symbols, or political slogans that could compromise the organisation's duty of political impartiality; and
- any reasonable adjustments, religious or cultural dress, or other protected characteristics are respected in accordance with the Equality Act 2010, provided these do not conflict with health and safety or safeguarding requirements.

Where staff are unsure whether their dress or appearance is appropriate, they should seek advice from their line manager.

12. Conduct outside the Workplace

Staff are expected to maintain the highest standards of professional conduct both within and outside the workplace. Behaviour outside working hours, including online activity, should not undermine public confidence in EMLM, compromise safeguarding, damage professional relationships or bring the organisation or the education profession into disrepute.

This includes, but is not limited to:

- criminal conduct or behaviour that calls into question an individual's suitability to work with children;
- conduct that may constitute a safeguarding risk;
- discriminatory, abusive, harassing or offensive behaviour;
- inappropriate use of social media or digital communications;
- breaches of confidentiality or data protection requirements; and
- any behaviour that is inconsistent with the standards expected of someone working in a position of trust.

Staff must inform the Headteacher (or other appropriate senior leader) as soon as reasonably practicable if they are arrested, charged with, cautioned for, or convicted of any criminal offence, or become subject to any investigation or circumstances that may affect their suitability to work with children or fulfil the requirements of their role. This will be considered in accordance with relevant safeguarding, employment and regulatory requirements.

13. Policy Monitoring and Review

This Code of Conduct will be reviewed annually, or earlier where required, to reflect changes in legislation, statutory guidance, best practice or organisational requirements.

The Head of School and senior leadership team are responsible for promoting, implementing and monitoring compliance with this Code. The Board Members are responsible for ensuring appropriate governance and oversight of the Code and its effectiveness.

This Code should be read alongside EMLM's safeguarding framework and all associated policies and procedures. References to statutory guidance, including *Keeping Children Safe in Education (KCSIE)*, should be interpreted as referring to the current version in *(KCSIE)*, should be interpreted as referring to the current version in force.

All staff have an individual and collective responsibility to uphold the standards set out in this Code, to act in the best interests of learners, and to report promptly any concerns relating to safeguarding, professional conduct, malpractice or behaviour that may place children, colleagues or the organisation at risk.

For the purposes of this Code, the term *relationship* includes, but is not limited to:

- business, commercial or financial relationships;
- friendships or social relationships;
- family or close personal relationships; and
- intimate, romantic, emotional or sexual relationships.

Staff must ensure that any actual, potential or perceived conflict arising from such relationships is declared and managed appropriately in accordance with this Code and EMLM's related policies.

Appendix 1: Working Together Principles

At EMLM, we believe that positive professional relationships are fundamental to creating a safe, inclusive and supportive environment for learners, colleagues and the wider school community. All staff are expected to contribute positively to a culture of collaboration, trust and mutual respect.

We will:

- greet colleagues, learners and visitors courteously and respectfully;
- treat everyone with dignity, kindness, professionalism and respect;
- recognise and celebrate the achievements and contributions of others;
- work collaboratively, offering support to colleagues, particularly during periods of increased workload or challenge;
- communicate honestly, openly and constructively, even when conversations are difficult;
- listen respectfully to different perspectives and value the contributions of others;
- approach challenges with a solution-focused and professional mindset;
- raise concerns appropriately and address disagreements respectfully, professionally and, wherever possible, directly with those involved;
- avoid gossip, unprofessional behaviour or actions that undermine colleagues or the organisation;
- assume positive intent while recognising that professional challenge is an important part of continuous improvement;
- contribute to an inclusive workplace where everyone feels valued, heard and able to contribute; and
- promote the values and reputation of EMLM through our words, actions and professional conduct.