

# CODE OF CONDUCT

## 1. Introduction

- 1.1. The standards outlined in this document are representative of the standards of performance and behaviour that are expected of Haddon Training's staff and are not intended as a complete listing of all the rules, regulations and standards.
- 1.2. Only through the observance of such standards can Haddon Training effectively and efficiently serve its external and internal customers.
- 1.3. The relationship between Haddon Training and its employees is based upon mutual respect, trust and confidence. This Code of Conduct sets out some of the standards upon which this relationship is to be based.

## 2. Scope

- 2.1. The Code of Conduct applies to all employees of Haddon Training and anyone working within it on a voluntary, sub-contractor or placement basis.
- 2.2. It is the responsibility of all members of Haddon Training's staff to familiarise themselves with, and adhere to, all of the rules, policies and procedures.
- 2.3. Failure to comply with the standards of performance and behaviour outlined in this document may result in disciplinary action in accordance with Haddon Training's disciplinary procedure. Such disciplinary action may include dismissal depending on the circumstances.
- 2.4. All employees will be made aware of the Code of Conduct and will sign to confirm their understanding and acceptance of the standards set out within it.

## 3. General

- 3.1. Employees are expected to behave in a way that demonstrates Haddon Training's values. This includes professional behaviour at all times, treating colleagues, customers and the wider community with respect and taking responsibility for their own behaviour and actions.

## 4. Professional behaviour and conduct

- 4.1. Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. Haddon Training expects staff to treat each other, learners, parents, employers and the wider community with dignity and respect at all times.
- 4.2. Haddon Training always expects staff to present themselves in a professional and positive manner. This includes, but is not limited to:
  - 4.2.1. Adhere to dress codes as described in point 17
  - 4.2.2. Use of appropriate PPE for the environment or at the request of a customer when visiting their site
  - 4.2.3. Behaviours in line with guidance set out by customers when visiting their sites
- 4.3. Staff must act in accordance with their duty of care to learners and ensure that the safety and welfare of learners are accorded the highest priority.
- 4.4. Staff should show fairness in their treatment of learners and avoid behaviours such as

embarrassing or humiliating learners, making jokes at the expense of learners, discriminating against or favouring learners and sarcasm.

- 4.5. Staff must show tolerance of and respect the rights of others and should uphold the fundamental British Values including democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs.
- 4.6. Staff must have regard for the ethos and values of Haddon Training and must not do or say anything which may bring the business into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside of work and responsibilities within work. Staff should act in accordance with Haddon Training's policies and procedures at all times.

## **5. Attendance and timekeeping**

- 5.1. Employee attendance at work is expected to be punctual. Instances of lateness should be explained by the employee concerned to his/her line manager, who will monitor the situation and take action as appropriate in accordance with Haddon Training's procedure.
- 5.2. It is the responsibility of management to approve any variations (including any short-term variations) to an individual's normal hours of work. Individuals should not vary their normal hours of work without prior management approval.
- 5.3. Haddon Training's absence management procedure outlines the standards that are expected of all employees and the procedures that should be followed during any period of absence. It also provides details of how Haddon Training will address and manage all issues related to employee absence.

## **6. Alcohol, smoking, e-cigarettes and substance abuse**

- 6.1. Employees must not attend work under the influence of any substance, including alcohol, illegal drugs and/or solvents. Employees who have been prescribed medication by a healthcare professional must inform their line manager immediately if that medication has, or could, have an adverse effect on the employee's ability to carry out his/her duties.
- 6.2. Staff must not smoke or use an e-cigarette whilst working with or supervising learners.
- 6.3. Haddon Training's Drug Policy and Alcohol Policy outlines the standards expected of all staff in relation to drug and alcohol use and abuse, and provides guidance on managing issues related to such use and abuse and the action that will be taken by Haddon Training in instances of non-compliance.

## **7. Bullying and harassment**

- 7.1. Haddon Training recognises that all members of staff, learners, employers, customers and stakeholders have the right to be treated with consideration, respect and dignity, and is committed to creating and maintaining a working environment free from discrimination, harassment, bullying, intimidation and victimisation.
- 7.2. To clarify, bullying and/or harassment is verbal, non-verbal or physical conduct which is unsolicited or unwelcome and which another individual considers violates their dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- 7.3. Instances of bullying and/or harassment at work, or outside work if it has a bearing on the working relationship, is unacceptable and will not be tolerated. All instances of bullying and/or harassment will be managed through the Anti-Bullying and Harassment Policy and Haddon Training's disciplinary procedure as appropriate.
- 7.4. Examples of bullying/harassing behaviour could include:

7.4.1. Spreading malicious rumours, or insulting someone

7.4.2. Exclusion or victimisation

7.4.3. Unfair treatment

7.4.4. Deliberately undermining a competent worker by constant criticism

7.5. Under the Equality Act 2010, harassment is unwanted conduct which is related to one of the following: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and is therefore unlawful.

## **8. Conduct outside of work**

8.1. Haddon Training does not seek to dictate how employees conduct themselves in their personal lives outside work. However, unlawful, anti-social or other conduct by employees which may jeopardise Haddon Training's reputation or position may be dealt with through the disciplinary procedure.

## **9. Confidentiality**

9.1. All members of staff have a personal responsibility to protect and maintain the confidentiality of all Haddon Training information, including that of learners, employers, employees and stakeholders. The disclosure of confidential information relating to Haddon Training and/or its internal or external clients is prohibited, except as authorised or required by the law or in accordance with an employee's duties under his/her contract of employment (including statement made between or to Trade Union Representatives) or when making a protected disclosure under the Public Interest Disclosure Act.

9.2. If employees are unsure as to whether they should disclose information which they consider to be, or might be, confidential, they should seek guidance from their line manager.

9.3. Full details of the covenants by which employees are bound in respect of confidentiality are outlined in their contracts of employment.

9.4. A breach of confidentiality may result in disciplinary action being taken against the employee/s responsible in accordance with the disciplinary procedure.

9.5. Any confidential data, including data storage devices such as mobile phones and laptops, taken off-site must be securely stored and not left in an unattended vehicle.

9.6. Any paperwork removed from the office must have a full audit trail attached in order that location is known at all times, any confidential items must only leave the office with the agreement of a line manager.

9.7. Staff should familiarise themselves with GDPR and the Data Protection Policy.

## **10. Company vehicles and driving for business activity**

10.1. Haddon Training is committed to ensuring that employees are kept as safe as possible whilst undertaking any task on behalf of the business, including driving during the course of work or for business activities.

10.2. There are many members of staff who are required to either drive a company vehicle or their own vehicle for business activities. Individuals should refer to the Car Policy, Safe Driving Policy and their contracts of employment for more detailed information.

## **11. Suitability to work with children and vulnerable adults**

11.1. Haddon Training works in line with Keeping Children Safe in Education September 2018

(KCSiE)

## 11.2. Disclosure and Barring Service (DBS) Check

11.2.1. Haddon Training is committed to adhering to the DBS Code of Practice.

11.2.2. Roles at Haddon Training are assessed in order to decide which level of DBS disclosure is required.

11.2.3. There may be instances when existing members of staff will require a new DBS check.

11.2.4. DBS checks are undertaken to ensure that Haddon Training upholds its duty of care to protect vulnerable groups who access the services provided by the business. Failure to cooperate with a reasonable request on the part of Haddon Training to obtain a DBS check may result in disciplinary action being taken in accordance with the disciplinary procedure.

## 12. Police enquiries of current employees

12.1. All employees have an obligation to inform Haddon Training if he or she are the subject of criminal investigations, charge, caution, warning or conviction. Failure to do so may result in disciplinary action.

12.2. An employee will not face disciplinary action solely because he or she are the subject of criminal investigations, charge, caution, warning or conviction. The question that Haddon Training needs to address in such cases is whether the conduct warrants disciplinary action because of its effect on the employee's ability or suitability to undertake his/her job role and/or on the reputation of the business. In such circumstances, the facts of the matter should be investigated and if disciplinary action is considered appropriate, the procedure outlined in this document should be followed. Haddon Training will not usually wait for the outcome of any prosecution before deciding what action, if any, to take.

## 13. Allegations against staff (Safeguarding)

13.1. Any allegations of abuse (to learners) against staff must be referred to one of the Designated Safeguarding Leads.

13.2. Where staff have any safeguarding concerns about another member of staff, these concerns must be reported immediately to one of the Designated Safeguarding Leads.

13.3. If the accused person resigns or ceases to provide their services, this should not prevent an allegation being followed up in accordance with Keeping Children Safe in Education September 2018 guidance.

13.4. All staff must familiarise themselves with our Child Protection & Safeguarding Policy.

## 14. Personal Relationships

14.1. Between staff and learners

14.1.1. Under the Sexual Offences Act 2003, it is an offence for anyone in a position of trust to engage in sexual activity (including touching of a sexual nature) with a person under the age of 18 who is in their care. The position of trust definition applies to all teachers, assessors, trainer-coaches and other staff in an educational setting. Such a breach of trust is an arrestable offence, even if the activity and/or relationship is consensual. Anyone successfully convicted under this legislation will be subject to notification requirements and registration under the Sex Offenders Act 1997.

14.1.2. Relationships with learners who are vulnerable adults are also prohibited. This type of relationship could be viewed as an abuse of employee's position of trust and breach

of standards of professional conduct expected in a learning provider.

- 14.1.3. Employees in such a position of trust must not enter into personal relationships with any learner under the age of 18, and must not encourage behaviour on the part of the learner which goes beyond that which could ordinarily be expected from a staff/learner relationship.
- 14.1.4. These rules will be strictly enforced. Any member of staff who enters such relationships will be subject to the disciplinary procedure, this may constitute gross misconduct, which could lead to summary dismissal and referral to the Independent Safeguarding Authority. Furthermore, in suspected cases of an abuse of a position of trust, Haddon Training may report those concerned to the police.
- 14.1.5. In respect of allegations against staff, Haddon Training will follow the framework set out in Keeping Children Safe in Education September 2018.
- 14.1.6. It is vital that staff work within appropriate professional boundaries at all times with children, young people and vulnerable adults with whom they are in a position of trust.
- 14.1.7. There are some situations that are never appropriate while working with learners, such as drinking alcohol.
- 14.1.8. Personal relationships between employees and learners over the age of 18 years must be disclosed to Haddon Training via the employee's line manager. This requirement equally applies to relationships that existed prior to the employment or enrolment and to relationships that develop while the learner is in education with Haddon Training. Haddon Training will put in place appropriate arrangements to ensure that the learner's training, coaching and assessment is free from bias. Haddon Training will also advise the member of staff and learner that their relationship should be conducted entirely in their personal time. Although the line manager will treat the disclosure sensitively and in confidence, it is likely that other members of staff will need to be informed. This will be on a strictly need-to-know basis. Failure to disclose a personal relationship with a learner will be dealt with under the disciplinary procedure.
- 14.1.9. Staff must not make contact with learners through their personal social media accounts or personal mobile phone number.

#### 14.2. Between staff

- 14.2.1. If you perceive that a personal relationship you have with a colleague may give rise to a professional conflict/compromise, then you should bring this to the attention of your line manager or their manager. This applies equally to relationships that existed prior to employment and to relationships that develop whilst at Haddon Training. Such disclosures must be treated with respect, dignity and in confidence, however it may be necessary for the line manager to discuss this with their line manager or Human Resources but this will be on a strictly need-to-know basis and will be discussed with the employee in the first instance. The line manager will be responsible for making appropriate alternative arrangements where necessary to avoid any conflicts of interest.
- 14.2.2. In some cases it may be necessary to consider moving an employee if it is perceived that there is a conflict of interest in order to protect both parties. Full discussions will take place with the individual.

#### 14.3. Between staff and employer or service provider

- 14.3.1. If you perceive that a personal relationship you have with an employer or service provider may give rise to a professional conflict/compromise you should bring this to the attention of your line manager or their manager. Such disclosures must be treated with respect, dignity and in confidence.

14.3.2. If you are unsure what action to take or how you should respond to any situation you must immediately contact your line manager or one of the Designated Safeguarding Leads.

## **15. Infatuations**

- 15.1. It is not unusual for learners, or sometimes, their parents to develop infatuations towards a member of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.
- 15.2. Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards yourself or another member of staff must be reported to your line manager.

## **16. Disclosure of interest**

- 16.1. In order to uphold fairness and consistency, and to comply with regulations (including, but not limited to financial regulations), members of staff must disclose any interests and/or relationship(s), whether direct or indirect, that they have with any person, learning provider, company or other organisation involved with Haddon Training and/or its business and/or activities which may give rise to conflict or compromise.

## **17. Standards of dress**

- 17.1. Haddon Training recognises that, where appropriate, dress and appearance are matters of personal choice and self-expression. However, all staff must dress in a manner that is appropriate to their role and promotes a professional image in line with the company ethos and values, this includes but is not limited to:
  - 17.1.1. Wearing of company branded clothing that is clean and pressed
  - 17.1.2. Wearing clean and safe footwear appropriate to the environment
  - 17.1.3. Wearing smart and clean unbranded clothing where Haddon branded options are not provided
  - 17.1.4. Wearing of your ID lanyard at all times
- 17.2. Some roles necessitate employees to wear staff uniform or items of protective clothing in the interests of health and safety. Such items must be worn at all times as required.
- 17.3. Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.

## **18. Equality and diversity**

- 18.1. Haddon Training is committed to ensuring equality of opportunity for its employees and learners alike.
- 18.2. All employees have an individual responsibility to uphold and apply in practice Haddon Training's Equality & Diversity Policy. Staff must conduct themselves in a manner consistent with that policy and with relevant legislation. Discrimination and prejudice will not be tolerated and such conduct may result in disciplinary action being taken in accordance with the disciplinary procedure.

## **19. Bribery Act 2010**

- 19.1. Haddon Training values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will reflect adversely on its image and reputation. Its aim, therefore, is to limit the business's exposure to bribery by:

- 19.1.1. Setting out a clear Anti-Bribery Policy
- 19.1.2. Encouraging staff to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- 19.1.3. Rigorously investigating instances of alleged bribery and assisting Police and other appropriate authorities in any resultant prosecution.
- 19.1.4. Taking firm and clear action against any individual(s) involved in bribery.
- 19.2. Haddon Training prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated.
- 19.3. Individuals should discuss with their line manager if at any time they are in doubt as to whether a potential act constitutes bribery. If necessary, guidance can be sought from the HR Lead.
- 19.4. Further information and related procedures can be found in the Anti-Bribery Policy.

## **20. Gifts and hospitality**

- 20.1. Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment. However, there may be occasions where learners or employers wish to give a small token of appreciation of staff, for example at religious festivities or at the end of learning.
- 20.2. It is unacceptable to receive gifts on a regular basis or to suggest to learners that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift you should consult your line manager.
- 20.3. Staff must not accept significant gifts or hospitality from learners, parents, carers, employers, actual or potential contractors or outside suppliers. All such gifts/offers of hospitality should be reported to your line manager and recorded.
- 20.4. Personal gifts must not be given by staff to learners.

## **21. Financial regulations**

- 21.1. Haddon Training has established financial regulations which govern all activity associated with their approach to financial management and control, these regulations are governed by contracts held with the Education and Skills Funding Agency. All employees have an individual responsibility to uphold and apply in practice these regulations and any breach of them will be addressed in accordance with the disciplinary procedure. This may include but is not limited to:
  - 21.1.1. Failing to adhere to the funding rules as guided by the company
  - 21.1.2. Failing to provide evidence of learner identity, eligibility, engagement and progress
  - 21.1.3. Fraudulently providing evidence of learner identity, eligibility, engagement and progress
  - 21.1.4. Failure to advise the company in a timely manner of a learner who has failed to attend more than one visit

## **22. Health and Safety**

- 22.1. Haddon Training is committed to promoting and implementing all relevant health and safety legislation and recognises that the highest priority must be given to safe methods of work at all times.
- 22.2. Employees must familiarise themselves with the Health & Safety Policy and must ensure that all health and safety standards are met in accordance with that policy. Employees must not, under any circumstances, behave in a way which could endanger their own health and safety

or the health and safety of others.

- 22.3. Any breach of Haddon Training's health and safety rules or regulations or its Health & Safety Policy will be viewed extremely seriously and may constitute gross misconduct in accordance with the disciplinary procedure.

### **23. Damage to property**

- 23.1. Anyone suspected of, or caught, causing deliberate damage to Haddon Training property, hired plant or third party property belonging to Haddon Training or client premises will be subject to disciplinary action in accordance with the disciplinary procedure.
- 23.2. Any staff who are found to have caused deliberate damage to Haddon Training property will be liable for replacement or repair of said items.

### **24. Statements to the press or other media**

- 24.1. Statements to the press or other media on any aspect of Haddon Training's business and/or activities must not be made without prior reference to the Managing Director. Although this does not apply to Trade Union Representatives acting in a Trade Union capacity. Haddon Training and trade unions would inform each other on press statements affecting each other's business.
- 24.2. The reasons for this will no doubt be appreciated by employees, as often the Senior Management Team is more aware than staff of Haddon Training's opinion on controversial matters and can therefore ensure that appropriate statement is made.
- 24.3. Any statement made in contravention of this rule may lead to disciplinary action being taken against the employee/s concerned in accordance with the disciplinary procedure.

### **25. Theft**

- 25.1. Anyone who is suspected of or caught stealing the property or assets of Haddon Training, its employees or clients will be subject to disciplinary action in accordance with the disciplinary procedure. The Police may be notified.

### **26. Use of Information Technology**

- 26.1. All employees have an individual responsibility to uphold and apply in practice the Communications, Email & Internet Policy. Breaches of this policy will be addressed in accordance with the disciplinary procedure.
- 26.2. All employees must familiarise themselves with Haddon Training's Communications, Email & Internet Policy, Mobile Phone Policy and Social Media Policy.

### **27. Guidance notes**

- 27.1. No Code of Conduct can hope to spell out the appropriate behaviour for every situation, nor should it seek to do so. Haddon Training relies on each member of staff to make a judgement of what is right and good practice in any particular situation.
- 27.2. If you are unsure determining what action is appropriate in any given situation it is recommended that you seek clarification from your line manager.
- 27.3. An individual who is not satisfied with an outcome arising from a decision reached in relation to their employment has the right to appeal using the stages outlined in the Grievance Policy and Procedure.
- 27.4. This document refers to Keeping Children Safe in Education September 2019. This can be found using the following link: <https://www.gov.uk/government/publications/keeping-children->

**This has been approved and authorised by:**

**Name:** Keira Walker

**Position:** HR Lead

**Date:** 30 March 2020

**Signature:**

A handwritten signature in black ink, appearing to read 'K Walker', written over a light grey horizontal line.