South Gloucestershire and Stroud College
(and all subsidiary companies)

Code of Conduct (Staff) Policy and Procedure

If you would like this document in an alternate format

Please contact the Human Resources Department

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Job Title/Role:	Director of People and Organisational Culture
Ref. No.: **Q/P 209**	**Date of this version:** **11/08/2021** **Review date:** 10/08/2024 (Subject to any legislative changes) **Upload to College website?** Yes **Upload to e-Campus?** No
Approved by:	SGS Further Education Corporation
Date:	07/10/2021

1. Policy Intent

1.1.   Throughout their employment with the SGS Group, staff are expected to act in the best interests of the Group, and SGS College's learners, at all times.

1.2.   The Group endeavour to create and embed a culture of openness, trust and transparency in which the Group's values and expected behaviour as set out in this staff code of conduct are consistently lived, monitored and reinforced by all staff.

1.3.   The purpose of this code of conduct is to clarify the nature of professional behaviour expected of all employees in support of the Group's mission and values:

> **Our Mission**: We positively change people's lives and add value to the social and economic wellbeing of our communities. We do this by providing high quality, innovative, accessible education and training in a friendly culture of mutual respect and support.
>
> **Our Values**: To act with honesty, respect, responsibility and care.

2. Scope

2.1.   This Code of Conduct applies to all employees of SGS College and all subsidiary companies and the senior leadership team of the SGS Group. Throughout this document, the employer will be referred to as 'the SGS Group' or 'the Group'.

2.2.   This Code of Conduct applies to volunteers and those on work placements in addition to employees of the Group and the same expectations and obligations apply to all wherever the term 'employee' is used in this document. It is the responsibility of everyone to familiarise themselves with, and follow all of the Group's rules, policies and procedures.

2.3.   The standards outlined in this document are representative of the standards of performance and behaviour that are expected of employees and are not intended as an exhaustive list. Specific expectations and obligations in relation to many of the topic areas that follow are covered in Group contracts of employment.

3. Procedure

3.1 Alcohol and Substance Abuse

3.1.1. Employees must not attend work under the influence of any substance, including alcohol, illegal drugs or solvents. Employees who have been prescribed medication by a healthcare professional must inform their

line manager immediately if the medication has, or could have, an adverse effect on the employee's ability to carry out their duties.

3.2 Attendance and Timekeeping

3.2.1 Employees' attendance at work is expected to be punctual. Instances of lateness should be explained by the employee to their line manager who will monitor the situation and take action as appropriate.

3.2.2 Employees' who are unable to attend work due to illness or injury must contact the HR department themselves, via the absence line, on the first day of absence no later than within 30 minutes of the start of their working day.

3.2.3 The Group's absence management policy and procedure outlines the procedures that should be followed during any period of absence. It also provides details of how the Group will address and manage all issues related to employee absence.

3.3 Bribery, Fraud and Financial Regulations

3.3.1 In accordance with its anti-bribery policy, the Group prohibits the offering, giving, solicitation or acceptance of any bribe, whether cash or any other inducement. Individuals should discuss with their line manager if at any time they are in doubt as to whether an act may constitute bribery.

3.3.2 Employees must not accept any gifts, fees or inducements for any service connected with their employment, with the exception of minor gifts, inexpensive marketing materials and cards. Individuals should act in accordance with the Group's financial regulations if they are offered any substantial gifts or if they require further clarification.

3.3.3 All employees have an individual responsibility to act in accordance with the Group's financial regulations when dealing with the invoicing and procurement of goods and services on behalf of the Group.

3.4 Bullying and Harassment, Discrimination and Prejudice

3.4.1 Every member of the SGS Group community has the right to be treated with consideration, respect and dignity, and the Group is committed to creating and maintaining a working environment free from discrimination, harassment, bullying, intimidation and victimisation.

3.4.2 Discrimination, extremism and prejudice will not be tolerated by the Group and all staff should be aware of their and the Group's obligations under the Prevent Duty with regard to ensuring Learners are not at risk of radicalisation. Staff have a statutory duty to 'actively promote' the fundamental British values of democracy, the rule of law, individual

liberty, and mutual respect and tolerance of those with different faiths and beliefs.

3.4.3 Staff also have the responsibility to manage any external speakers they may invite in, to ensure no extremist opinions are promoted. The Prevent duty defines extremism as "vocal or active opposition to fundamental British values [see 6.2]. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."

3.4.4 Any instance of bullying or harassment at work, or outside work if it has a bearing on the working relationship, is unacceptable and will not be tolerated. Incidents will be dealt with according to the Group's bullying and harassment policy.

3.5 Confidentiality

3.5.1 All staff have a personal responsibility to protect and maintain the confidentiality of both SGS Group and learner information. The disclosure of confidential information is prohibited, except as authorised or required by the law or in accordance with an employee's duties under their contract of employment or when making a protected disclosure under the Public Interest Disclosure Act.

3.5.2 If employees are unsure as to whether they should disclose information which they consider to be confidential, for example in a safeguarding context, they should seek guidance from their line manager.

3.5.3 Any confidential data taken off-site must be securely stored.

3.5.4 Further information may be found in the SGS Group's Data Protection Policy and the SGS Group's Safeguarding Policy.

3.6 Declaration of Interests

3.6.1 In order to uphold fairness and consistency, and to comply with SGS Group regulations, employees must disclose any interests or relationship that they have with any person, company or other organisation involved with the Group, or its business or activities, which may give rise to conflict or compromise.

3.6.2 Further information may be found in the Group's Declaration of Interests Policy & Procedure.

3.7 Disclosure and Barring Service (DBS)

3.7.1 For all roles it is a requirement to obtain an enhanced disclosure certificate from the DBS before commencing work with the Group. For regulated activity an DBS with barred checks will be undertaken.

3.7.2 Employees must inform the Group (via the Head of Human Resources) of any incidents or actions that may or do result in a caution or conviction being lodged against them after the certificate has been provided.

3.7.3 Failure to provide this information to the Group within one week of the incident or action without providing a reason acceptable to the Group may result in the termination of your employment with the Group.

3.8 Dress and Appearance

3.8.1 Employees should wear clothes and footwear that are professional and appropriate for their role, including an SGS Group lanyard and identification card. This is particularly important when teaching and in roles that are customer-facing, or for Duty Managers.

3.8.2 For some roles it is necessary to wear items of protective clothing in the interests of health and safety. Such items should be worn at all times as required.

3.8.3 During SGS Group holidays or periods of hot weather, staff may wear more relaxed clothing but:

- nothing that can be considered to be beachwear (including flip-flops)

- shorts should be tailored rather than sports shorts (unless in a sports function and wearing SGS College kit)

- short-sleeved shirts and smart T-shirts are acceptable

- if jeans are worn they should be clean and smart (without holes)

- slogan T-shirts should not be worn.

3.8.4 If unsure about the suitability of their clothing for their role an employee should seek advice from their line manager.

3.9 Educational Study Visits or Residential Visits

3.9.1 Staff should at all times be aware of how their actions could be perceived by others, including learners. In particular, when visiting other countries, they should take steps to understand the culture as preparation for the trip, so that they do not accidentally cause offence or break a law. What is acceptable behaviour in the UK may not be acceptable in other countries.

3.9.2 Potential breaches of the Code of Conduct on Study or Residential Visits:

- Being under the influence of alcohol or recreational drugs

- Possession of drugs

- Possession / use of alcohol if under 18 years of age

- Behaving in a disruptive, aggressive, abusive, intimidating or anti-social way

- Threatening or violent behaviour to another person

- Breach of guidelines given for specific venues or events, which may include drinking if under 18

- Any sexual or intimate relationship

- Any act or omission that risks, or potentially risks, the safety of learners

- Any act or omission that leaves the employee in a position of responsibility unable to deal with an emergency (e.g. if intoxicated)

- Behaviour inconsistent with the Group's values

- Behaviour inconsistent with the Group's legal duties in relation to Equality and Diversity

3.10 Health and Safety

3.10.1 The Group is committed to promoting and implementing all relevant health and safety legislation and employees must ensure that the highest priority is given to safe methods of work at all times.

3.10.2 Employees must not behave in a way which could endanger their own health and safety or the health and safety of others.

3.11 Personal Relationships

3.11.1 The Group does not normally consider it appropriate, particularly in a supervisory or line manager capacity, for family members or those with close personal relationships to work together.

3.11.2 However, where relationships exist or develop, these should be brought to the attention of the employees' line manager(s) and the Head of HR.

3.12 Relationships with Learners

3.12.1 Under the Sexual Offences (Amendment) Act 2003, if a professional in a 'position of trust' has sexual relations with any of their charges under 18 they could face a prison sentence and risk being placed on the sex offenders' register. Refer to the Abuse of Trust Policy and Procedure for further detail.

3.12.2 The Guidelines on Maintaining Professional Boundaries provides advice and guidance on appropriate working relationships with learners. Those guidelines apply to interactions with learners at all times, regardless of location.

3.13 Social Networking

3.13.1 Employees are expected to apply good judgement in their use of social networking and internet forums. They must ensure that nothing they post, or enable access to, can cause a detriment to the Group, its learners or staff.

3.13.2 Refer to the Group's IT Acceptable Use Policy - Social Networking (Staff) for more detail.

3.14 Use of Group Email and IT Systems

3.14.1 The use of the Group's email and IT systems is subject to various controls and restrictions designed to protect the security of data and the Group's reputation. Refer to the IT 'acceptable use' policies for more detail.

3.15 Sharing Concerns

3.15.1 The Group promotes a culture in which any concern / allegation about Staff, even a sense of unease or a nagging doubt about something, is shared responsibly and with the right person, to be recorded and dealt with appropriately.

3.15.2 The Group strives to encourage all staff to identify concerning, problematic or inappropriate behaviour early; to minimise the risk of abuse; and ensure that staff working in or on behalf of The Group are clear about professional boundaries and act within these boundaries, and in accordance with the mission and values of The Group.

3.15.3 All staff are expected to read and understand the SGS Safeguarding Policy and Procedures, following the correct reporting channel for any concerns, no matter how small.

3.15.4 The Group will review concerns raised on a case by case basis and in conjunction with the appropriate policy – this list is not exhaustive:

- Safeguarding Policy and Procedure
- Disciplinary Policy and Procedure
- Abuse of Trust Policy and Procedure
- Guidelines on Maintaining Professional Boundaries

3.15.5 The Safeguarding Policy and Procedure provides further guidance and information on how to report concerns.

3.15.6 All instances or concerns must be recorded on My Concern. A designated safeguarding officer will discuss this with the member of staff and their line manager (if relevant)

4. Policy <u>Implementation</u>

4.1. The SGS Group is responsible for ensuring the implementation of the policy.

5. Enforcement

5.1. Failure to comply with the standards of performance and behaviour outlined in this document may result in disciplinary action in accordance with the Group's disciplinary policy and procedure. Such disciplinary action may result in dismissal depending on the circumstances.

5.2. If an employee is ever unsure about what action is appropriate to a particular situation, they should seek advice from their line manager.

6. Related Policies, Procedures, Charters, Plans, Guidance and Legislation

6.1. Related Group policies, procedures and guidance can be found on SharePoint and include:

- [SGS College Abuse of Trust Policy & Procedure](#)
- [Absence Policy and Procedure](#)
- [Acceptable Facilities Usage Guidelines](#)
- [Anti-Bribery, Anti-Corruption & Anti-Fraud Policy](#)
- [Anti Bullying and Harassment (Staff) Policy and Procedure](#)
- [Data Privacy & Protection Policy](#)
- [Declaration of Interests Policy](#)
- [Staff Disciplinary Policy](#)
- [External Speakers and Freedom of Speech Guideline](#)
- [Health and Safety Policy](#)
- [IT Acceptable Use Policy – Social Networking (Staff)](#)
- [Prevent Duty Guidance for Further Education Institutes in England and Wales](#)
- [Guidelines for Maintaining Professional Boundaries (Including Social Media)](#)
- [Safeguarding Learners & Child Protection Policy & Procedure](#)
- [Guidance for safer working practice for those working with children and young people in education settings (May 2019)](#)
- Social Networking

7. Impact

7.1. The impact of this policy and related procedures is to ensure all staff adhere to the Code of conduct and expectations of all staff to act in the best interests of the Group at all times.

7.2. It is also to ensure all staff are aware of the expectations in supporting the Group's mission and values and that any concerns are acted on in accordance with this policy and related legislation and guidance.

8. Additional useful information

8.1. The Head of Human Resources will review and monitor the policy and procedures and will recommend and implement approved changes where necessary.

9. MANDATORY INITIAL IMPACT SCREENING			
Completed by:			
Name: Helen Edmunds-Lewis	Title: Head of Human Resources	13/08/2021	
I have read the guidance document: Completing a Policy Impact Assessment?			✓
If this policy has been up-dated, please tick to confirm that the initial impact screening has also been reviewed:			✓

EQUALITY AND DIVERSITY IMPACT ASSESSMENT	
Characteristic	This policy seeks to:
Age	Supports staff and learners to recognise that prejudice and discrimination on the grounds of age are unacceptable in an educational establishment
Disability	Encourage and promotes individuals with disabilities and aims to eliminate attitudes, practices and procedures that discriminate against people on the grounds of disability and/or learning difficulties/disabilities.
Faith or Belief	No appreciable impact
Gender	Protect staff and learners from sexism in all forms
Race or Ethnicity	Ensure that staff and learners are equipped to recognise racial and ethnic diversity and to challenge racial and ethnic discrimination
Orientation	Eliminate discrimination on the grounds of sexual orientation and promote equality of opportunity through a supportive, inclusive environment
Gender reassignment	Oppose sexism and be committed to taking positive action to identify and remove sexism from College life
Economic disadvantage	No appreciable impact
Rural isolation	No appreciable impact
Marriage	No appreciable impact
Pregnancy & maternity	Promote equality of opportunity through a supportive, inclusive environment
Carers & care leavers	No appreciable impact
Vulnerable persons	Safeguarding children or vulnerable adults
Please identify any sections of the policy that specifically seek to maximise opportunities to improve diversity within any of the College's stakeholder groups:	
Please identify any sections of the policy that specifically seek to improve equality of opportunity within any of the College's stakeholder groups:	
Is there any possibility that this policy could operate in a discriminatory way?	☐ ✗ If you have ticked yes (red), which characteristic will be most affected? Choose an item.
If yes please confirm that the Policy has been sent for a full Equality & Diversity Impact Assessment, and note the date:	☐ Click or tap to enter a date.

Note: if the policy does not seek to increase diversity or improve equality you should go back and review it before submitting it for approval.

MAPPING OF FUNDAMENTAL RIGHTS	
Which United Nations Convention on the Rights of the Child (UNCRC), Right does this policy most protect:	Art. 2 Non-discrimination Art. 3 Best interests of the child Art. 19 Protection from violence, abuse & neglect
Which Human Right (HRA) does this policy most protect:	Art. 14 Prohibition of discrimination Choose an item.

DATA PROTECTION & PRIVACY BY DESIGN SCREENING	
Tick to confirm that you have considered any data protection issues as part of the design and implementation of this policy; and, that implementing this policy will <u>not</u> result in the collection, storage or processing of personal data outside of official College systems:	✓
Tick to indicated that this policy has or requires a Data Privacy Impact Assessment:	✓