

**OXFORD PROFESSIONAL EDUCATION GROUP**

**January 2020**

**Reviewed: October 2023**

**Review due: October 2024**

**Reference number: 20**

**Staff Code of Conduct Policy**

**Purpose**

The standards outlined in this document are representative of the standards of performance and behaviour that are expected of OXPEG's working community and are not intended as a complete listing of all OXPEG's rules, regulations and standards.

Only through the observance of such standards can OXPEG effectively and efficiently serve its external and internal clients. The relationship between OXPEG 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.

**Scope**

This Code of Conduct applies to all employees of OXPEG and anyone working within it on a voluntary, contractual or placement basis. It is the responsibility of all members of OXPEG's working community to familiarise themselves with, and adhere to, all OXPEG's rules, policies and procedures.

Failure to comply with the standards of performance and behaviour outlined in this document may result in disciplinary action in accordance with OXPEG's disciplinary procedure. Such disciplinary action may include dismissal or termination of contract depending on the circumstances.

All employees, visitors and contractors 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.

**General**

Employees are expected to behave in a way that demonstrates OXPEG values. This always includes being professional, treating colleagues and customers with respect and taking responsibility for their own behaviour and actions.

**Attendance & Timekeeping**

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 OXPEG's capability or disciplinary procedure. 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.

OXPEG's absence management 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 OXPEG will address and manage all issues related to employee absence.

### **Alcohol & Substance Abuse**

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.

### **Bullying and Harassment**

OXPEG recognises that all members of its working community and its clients 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. 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. 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. Examples of bullying / harassing behaviour could include:

- spreading malicious rumours or insulting someone;
- exclusion or victimisation;
- unfair treatment;
- deliberately undermining a competent worker by constant criticism.

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.

### **Conduct Outside of Work**

OXPEG 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 OXPEG's reputation or position may be dealt with through the disciplinary procedure.

### **Confidentiality**

All members of OXPEG's working community have a personal responsibility to protect and maintain the confidentiality of both OXPEG and client information. The disclosure of confidential information relating to OXPEG 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 or when making a protected disclosure under the Public Interest Disclosure Act. 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. A breach of confidentiality may result in disciplinary action being taken against the employee or contractor. Any confidential data taken off-site must be securely stored. Staff should familiarise themselves with OXPEG's data protection policy.

### **Driving in Pursuit of College Activity**

OXPEG is committed to ensuring that employees are kept as safe as possible whilst undertaking any task on behalf of OXPEG, including driving during the course of work or in pursuit of college business or activities.

### **Suitability to Work With Children And Vulnerable Adults**

OXPEG works in line with 'keeping children safe in education July 2015'.

### **Disclosure and Barring Service (DBS) Checks**

OXPEG is committed to adhering to the DBS's Code of Practice. Roles at OXPEG are assessed in order to decide if a DBS disclosure or check is required and if it is, what level of disclosure is required. There will be instances when existing members of staff will also require a new DBS check, for example to comply with procedures governing learner residentials.

DBS checks are undertaken to ensure that OXPEG upholds its duty of care to protect vulnerable groups who access OXPEG. Failure to co-operate with a reasonable request on the part of OXPEG to obtain a DBS check may result in disciplinary action or termination of contract.

### **Police Enquiries of Current Employees**

All employees have an obligation to inform OXPEG if he or she are the subject of criminal investigations, charge, caution, warning or conviction. Failure to do so may result in disciplinary action. However, 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 OXPEG 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 OXPEG. 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. OXPEG will not usually wait for the outcome of any prosecution before deciding what action, if any, to take.

### **Allegations Against Staff (Safeguarding)**

Any allegations of abuse (to students) against staff must be referred to the Director: Human Resources and the DSL. The matter will then be referred to the local authority designated officer in line with 'Keeping children safe in education July 2015'. Where staff have any safeguarding concerns about another member of staff these concerns must be reported immediately to the Director with responsibility for Human Resources and DSL who will refer this to the local authority designated officer as above. 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 July 2015' guidance.

### **Personal Relationships**

#### **Staff**

Learners 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 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. Employees in such a position of trust must not enter 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. Relationships with learners who are vulnerable adults are 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 college. These rules will be strictly enforced. Any member of staff who enters such relationships will be subject to OXPEG's 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, OXPEG may report those concerned to the Police. In respect of allegations against staff, OXPEG will follow the framework set out in keeping children safe in education July 2015. It is vital that staff always work within appropriate professional boundaries with children and young people with whom they are in a position of trust. There are some situations that are never appropriate while working with students, such as drinking alcohol. Personal relationships between employees and learners over 18 years of age must be disclosed to OXPEG via the employee's Line Manager. 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 OXPEG's disciplinary procedure.

**Staff /workers must not contact, befriend, or accept friend requests learners through their own personal social media accounts or personal email addresses. Communication through mobile phone use must be limited to emergencies only and Zoom or Teams calls should be used as an alternative.**

Befriending/accepting friend requests from, existing funded learners, apprentices is **ONLY** allowed on the professional site LinkedIn where **prior permission from employer, apprentice and centre has been agreed together.**

If a funded learner, apprentice is deemed vulnerable (Learners with special educational needs and disabilities (SEND) this may affect permission, for befriending/accepting friend requests between learner and OXPEG staff on the professional site LinkedIn, being granted unless **the activity can always be supervised by either an additional member of OXPEG or the employer.** In these circumstances you must notify a member of the Safeguarding team who will risk assess, advise on and formalise the situation.

Any worker found to be in breach of the above Social Media OXPEG policy rules will be liable to disciplinary action or termination of contract.

The line manager will be responsible for making appropriate alternative arrangements where necessary to avoid any conflicts of interest. 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. If you perceive that a personal relationship you have with a client, service provider or learner 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. If you are unsure about what action to take or how you should respond to any situation you must immediately contact your line manager or the designated safeguarding lead.

### **Disclosure of Interest**

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

### **Standards of Dress**

Employees are expected to dress in a way which is appropriate to their role and their duties. Casual wear is permitted during office hours but external meetings (including office meetings, open evenings and exhibitions) require smart dress.

### **Equality and Diversity**

OXPEG is committed to ensuring equality of opportunity for its employees and learners alike. All employees have an individual responsibility to uphold and apply in practice OXPEG's Equality and



Diversity scheme and to conduct themselves in a manner consistent with that scheme and with relevant legislation. Discrimination and prejudice will not be tolerated by OXPEG and such conduct may result in disciplinary action being taken in accordance with OXPEG's disciplinary procedure.

### **Bribery Act 2010**

OXPEG 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 OXPEG's exposure to bribery by:

- Setting out a clear anti-bribery policy;
- 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;
- Rigorously investigating instances of alleged bribery and assisting Police and other appropriate authorities in any resultant prosecution;
- Taking firm and clear action against any individual (s) involved in bribery.

OXPEG 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 and whether they are a public official or body or private person or company by any individual employee, board member, agent or other person or body acting on OXPEG's behalf in order to gain any commercial, contractual or regulatory advantage for OXPEG in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

### **Gifts and Hospitality**

Employees must not accept any gifts, fees or inducements for any service connected with their employment (including, for the avoidance of doubt, any such gifts received from learners), except for minor gifts, inexpensive marketing materials and cards. Individuals should inform their Line Manager if they are offered any substantial gifts (over the value of £25) or if they require further clarification.

### **Health and Safety**

OXPEG is committed to promoting and implementing all relevant health and safety legislation and recognises that the highest priority must always be given to safe methods of work. Employees must familiarise themselves with OXPEG's Health and 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. Any breach of OXPEG's health and safety rules or regulations or its Health and Safety Policy will be viewed extremely seriously by OXPEG and may constitute gross misconduct in accordance with OXPEG's disciplinary procedure.



### **Damage to Property**

Anyone suspected of, or caught, causing deliberate damage to college property, hired plant or third-party property within the confines of college and/or client premises will be subject to disciplinary action in accordance with OXPEG's disciplinary procedure.

### **Statements to the Press Or Other Media**

Statements to the press or other media on any aspects of OXPEG's business and/or activities must not be made without prior reference to the Managing Director.

### **Theft**

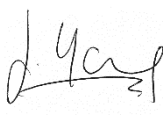
Anyone who is suspected of or caught stealing the property or assets of OXPEG, its employees or clients will be subject to disciplinary action in accordance with OXPEG's disciplinary procedure. The Police may be notified.

### **Use of Information Technology**

All employees have an individual responsibility to uphold and apply in practice OXPEG's IT Policies. Breaches of any IT related policies will be addressed in accordance with OXPEG's disciplinary procedure. All employees must familiarise themselves with OXPEG's email etiquette guidance; Acceptable use of ICT and information security policy and E Safety policy.

### **Guidance Notes**

No code of conduct can hope to spell out the appropriate behaviour for every situation, nor should it seek to do so. OXPEG relies on each member of staff to make a judgement of what is right and good practice in any situation. If you are unsure determining what action is appropriate in any given situation it is recommended that you seek clarification from your Line Manager. 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 procedure.

Signed: 

Date: October 2023