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Policy Statement:

Staff Code of Conduct

Date approved:	December 2025		Review Date:	December 2026	
Approved by:	People Committee				
Relevant to (please ☒):	☒ Bede	☒ Innersummit	☒ NETA	☒ RCC	☒ SRC
Signed (Lead Manager):	Adele Currie				
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1 PURPOSE

The purpose of this policy is to provide a clear set of principles to guide staff in how they are expected to conduct themselves in day to day both in and outside of work.

It is not possible to write an exhaustive list of rules governing staff conduct. Staff should be trusted in the discharge of their responsibilities, allowing room for initiative and professional judgement and decision making which demonstrates their suitability to be a part of the Etc. Group or work with children and vulnerable adults.

2 SCOPE

This Policy covers all staff, volunteers, governors, agency, students, visitors and contractors.

3 STATEMENT OF ACTION

Etc. is committed to providing clear employment policies and procedures that form a basis for treating all employees fairly and equally.

Etc. will regularly review all human resource policies and procedures in line with changes to employment law and where applicable best practice to support our Great Place To Work Strategy.

4 LINKED POLICIES

- Whistleblowing policy and procedure
- Disciplinary policy and procedure
- Harassment, discrimination and bullying policy and procedure
- Sexual Harassment Policy

5 LOCATION AND ACCESS

The Group Gateway site – Human Resources Policies and Procedures



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Procedure: Staff Code of Conduct

1.0 Purpose

- 1.1 The purpose of this policy is to provide a clear set of principles to guide staff in how they are expected to conduct themselves in day to day both in and outside of work.
- 1.2 It is not possible to write an exhaustive list of rules governing staff conduct. Staff should be trusted in the discharge of their responsibilities, allowing room for initiative and professional judgement and decision making which demonstrates their suitability to be a part of the Etc. Group or work with children and vulnerable adults.
- 1.3 This document, however, provides a consistent framework and guidelines.
- 1.4 Staff should seek advice from the Head of Human Resources (HR) in the first instance or a member of the Senior Management Team (SMT) if they have any queries about the content of this document, or if they require advice on how any aspect of conduct may be regarded.

2.0 Scope

- 2.1 This Policy covers all staff, volunteers, governors, agency, students, visitors and contractors.

3.0 References and Related Documentation

- 3.1 This Procedure should be read in conjunction with the following documentation:
 - Safeguarding policy
 - Disciplinary policy and procedure
 - Single equality scheme
 - Financial procedures, specifically anti bribery, procurement and gifts and hospitality
 - Whistleblowing policy and procedure
 - Harassment, discrimination and bullying policy and procedure
 - Sexual Harassment Policy

4.0 Professional boundaries / working with students

- 4.1 All members of staff are responsible for ensuring their relationships with learners are never of a kind that could compromise their professional responsibilities. This means professional boundaries must be maintained at all times. This includes:
 - Personal contact details should not be given to learners
 - Personal phone numbers and email should not be used to contact learners

- Learners and staff should not be ‘friends’ on Facebook or in contact via other personal social media other than those approved such as ‘Group Facebook groups’ which are monitored. This includes using private messaging on group platforms. Staff should also be cognisant of public postings (e.g. Facebook/Instagram) and the potential implications of such posts being accessible to students. Staff should note that whether you or someone else posts to your social media handles, you are responsible for this content, therefore privacy settings should be considered.
- If a member of staff is thought or identified to be behaving in a way that is putting a young person at risk, or behaving inappropriately with any learner in a manner that could be seen to be subjecting them to harm or duress, this should be reported to the Group Designated Lead for Safeguarding or any member of SMT immediately

Student Family Links, Associations and Social Links

If you have a close association with a student, even if the student is over 18 this needs to be disclosed to your Line Manager and the Student Experience and Wellbeing Team (contact details).

This is important for safeguarding, maintaining professional boundaries, and avoiding any conflicts of interest actual or alleged.

This requirement covers all job roles, not just in cases where your role involves teaching, supporting, or making decisions that could affect the student.

You must disclose any associations as soon as it becomes applicable and not just through the annual declaration process.

Immediate family members:

- Son or daughter (including stepchildren, adopted children, or children from previous relationships)
- Siblings (brother, sister, half-sibling, step-sibling)
- Spouse or civil partner
- Parent or step-parent

Extended but close family (especially if there’s a close connection or influence):

- Niece/nephew
- Grandchild
- Cousin (if living together or involved in daily care/support)
- In-laws (mother-in-law, brother-in-law, etc.)

Other close personal relationships (not familial but relevant):

- A child you act as guardian for
- A partner's child, even if not formally a stepchild
- Close family friends where you have a significant ongoing role (e.g. godparent or similar informal guardian role)
- Friend of a dependant, who is sometimes in shared social situations, they may visit your home to meet a friend or benefit from transport you provide to a group of friends.
- A student is a member of a Club, Hobbies Group you attend, whether you are an active member of the group or are often in the company of the student in the social group e.g. taking your child to a Football or Dance club.
- You are a Trustee of a Club in which Students attend are associated with
- You employ a student in your business or have an association via another employment

5.0 Additional professional responsibilities

5.1 Staff are reminded that they are expected at all times to:

- Not engage in any capacity with the media and if approached to advise the Group Director of Marketing and Business Engagement immediately. The only exception to this is where the person approached is a member of the senior management team in this case advice should still be sought from the Group Director of Marketing and Business Engagement in the first instance, as far as is reasonably practicable, but if this is not possible then personal professional judgement should be utilised.
- Preserve the confidentiality of information relating to the group's business which includes: staff, learners, finances, marketing and strategic planning, together with any further information rightly to be judged the property of the group (except as outlined in Whistleblowing policy and procedure) and/or could reasonably be considered commercially sensitive.
- Wear their Group ID with the appropriate coloured lanyard at all times when on group premises
- Support the monitoring of fundraising activities to ensure that monies raised are not used to fund extremism and so prevent a damaging effect on the safeguarding of learners and the group's reputation.

6.0 Gifts and Hospitality

6.1 It is an offence under the Bribery Act 2010 for members of staff to accept corruptly any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity.

6.2 The guiding principles to be followed by all members of staff must be:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest
 - The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation
- 6.3 Members of staff should not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work that would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a business decision as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than the group would be likely to provide in return.
- 6.4 When it is not easy to decide between what is and what is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from a member of the Senior Management Team or Director of Governance. For the protection of those involved, the Clerk to the Corporation will maintain a register of gifts and hospitality received where the value is in excess of £10. Members of staff in receipt of such gifts or hospitality are obliged to notify the Clerk to the Corporation promptly.
- 7.0 Bribes and inducements**
- 7.1 The making or accepting of bribes or any other inducements, financial or non-financial, in respect of any transactions carried out on behalf of the group by any staff is forbidden and shall be a disciplinary offence.
- 8.0 Working with Colleagues**
- 8.1 Staff must adhere to the group's policies and procedures, in particular the 'Tone of Voice' and be aware their actions may have consequences for others.
- 8.2 Staff must attend meetings and other commitments on time and meet other deadlines on which their colleagues depend.
- 8.3 Staff must adhere to the group's policies and procedures because their actions have consequences for others. If staff have any doubts or concerns about their own or a colleague's actions, they should seek advice from their line manager. All group policies and procedures are on the staff gateway.
- 9.0 Professional Prejudice**
- 9.1 The group sets an expectation of mutual respect among all staff at all times regardless of professional role and we therefore do our best to avoid 'professional prejudice'. Professional prejudice is the belief, based on presumption rather than evidence, that one part of an organisation's staff are in some way more professional than another part of its staff or that some skills within the organisation are more important or somehow superior to others. Professional

prejudice harms the effectiveness of organisations because it attacks victims' self-esteem.

9.2 Professional prejudice is frequently unintentional and inadvertent and, for example, can show as:

- Not understanding the contribution of support staff to the group mission, vision and values.
- Failing to act on instructions correctly or respond to a colleague's request with reasonable promptness
- Careless use of language when referring to colleagues
- Assuming that other colleagues are under less work pressure than oneself
- Failing to treat a colleague's skills and abilities with the respect one would expect for one's own.

10.0 Representing the group

10.1 In order to preserve the reputation of the group, staff must:

- Check with the relevant budget holder before committing resources other than those for which they have responsibility
- Take care over the use of group/college headed notepaper and logo's, whether for use themselves or the use of learners they are supervising; in particular ensure that written communication they are sending outside the group is in line with agreed branding standards which are available on the Gateway. In the event of any concern, seek assistance from a member of the Secretariat team
- Maintain professional standards of conduct at all times towards others when acting in a Group capacity
- Dress appropriately when acting in a professional capacity
- Not engage in activity that would bring the group into disrepute
- Use appropriate language at all times

11.0 Group Property

11.1 In order to preserve the quality of the group's environment and physical resources staff must ensure that:

- They, and learners for whom they are responsible, take reasonable care of the group premises and property which they use
- Procedures for borrowing group equipment are observed
- Energy is conserved wherever possible
- The security of group property is maintained as well as possible and not put at risk

- They pay the group for any costs incurred by the personal use of group equipment (for example phone, photocopier)
- Additionally, staff should also assist with the security of the group by directing/escorting to Reception anyone who they think might be a stranger on site
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12.0 Social Media

In today's world, connecting through social media is easier than ever and it's important to keep clear boundaries between personal online activity and professional relationships with students. Staff must not share personal contact details, including phone numbers or email addresses, with learners. Personal social media platforms (such as Facebook or Instagram) should not be used to connect with students, including private messaging, unless through approved and monitored group channels.

If you identify yourself as an employee of the Etc. online — whether directly or indirectly — your posts and interactions may be linked back to your employment. Whether it is through your activity or through sharing, 'liking', or re posting another users content. Depending on the nature of material, this could create a reputational risk or safeguarding implications.

Ultimately you are responsible for the content on your social media accounts, including posts by others, we advise you regularly check privacy settings to prevent inappropriate access.

Any concerns about inappropriate social media content, behaviour or risks to a learner through must be reported immediately to the Group Designated Safeguarding Lead or a member of the Senior Management Team.

- Uphold public trust: do not post or interact with anything discriminatory, offensive, or that could bring the profession into disrepute.
- Keep boundaries clear: do not "friend," "follow," or private message learners or their families on personal accounts.
- Safeguard confidentiality: never post or discuss information about learners, parents, colleagues.
- Use privacy settings carefully: keep personal and professional accounts separate, and review regularly.
- Think before posting: assume anything online could become public, even in closed groups or private chats.
- Report concerns: if you see inappropriate or unsafe online behaviour relating to learners or staff.

- If a pupil or parent attempt to “friend” or interact with you on social media, report this to your line manager.

13.0 Requirement to disclose relevant information

We respect an employee’s right for their private and family life which is separate from the workplace.

However, there are occasions where matters outside of work are relevant for you to disclose to us as your employer or may be disclosed to us from a third-party such as the Local Authority Designated Officer (LADO) or Police. As an employer working in regulated activity with children and vulnerable adults, we have an obligation to explore relevant information. This could be linked to your own personal conduct or actions or of the people you are closely associated with, such as friends, family members or partners.

This sharing of information could be to support you as an employee, safeguard students, manage social media/press coverage or protect the reputation of Etc. and decisions may be made on suitability of the work you are employed to do and transferable risk to employment.

Sometimes it is simply for us to have an awareness of a developing situation which could require support for you as an employee or action from the Etc.

Examples of where a disclosure of information may be relevant is listed below.

Conduct, Involvement from Formal Authorities and Personal Associations

- You have been arrested, cautioned, subject to investigation, criminal charges are made against you by the Police.
- DRIVING WORDING
- You have been subject to repeat engagement with the Police i.e. frequent attendance at a property due to domestic disputes/disturbances – especially where domestic abuse is alleged or children have witnessed a domestic incidence which resulted in Police attendance.
- Involvement of Children’s or Adult Social Services where the wellbeing of a child or vulnerable adult in your care, shared place of residence has required the involvement from the Local Authority under its duty to Safeguard.

Personal Circumstances and Associations

- You are being stalked and concerned about your safety
- Due to a relationship breakdown, you are subject to threats from someone to contact your employer and make up vexatious allegations which you are fearful will impact your employment.
- You are subject to domestic abuse and require support at work, adjustments to protect your wellbeing.

- A person closely linked to you is arrested whether they live with you or not, is cautioned, subject to investigation, or criminal charges in connection to charges of sexual and/ or domestic offences. We will need to assess transferable risk to your workplace.
- Involvement in an online attack that has resulted in you being subject to blackmail or extortion

You can in first instance share information with your line manager or the HR department.

14.0 Annual Declarations

We are committed to creating a workplace where everyone feels supported, valued, and able to thrive.

To support this, we require all employees to complete an annual declaration; this process allows us to remind you of key policies and available resources to support you at work, along with your responsibilities as an Etc. employee.

If you have any questions about the Annual Declaration, linked policies or would like to discuss before commencing the form, please get in touch with the HR department.

All Etc. staff are required to submit an annual declaration, declaring the following:

- They understand where to access health and wellbeing information
- They understand Group policies and procedures
- They understand and agree to the expected standards of conduct set out within this policy
- They understand their responsibilities in relation to social media and their privacy settings
- Their requirement to disclosure relevant information listed within the declaration
- They understand their role in preventing harassment, sexual harassment, discrimination and bullying
- Their responsibilities to disclose family links, associations and social links with students