

	TITLE		REF	VERSION
	Professional Conduct Policy		HR006	2.1
	APPROVAL BODY:		DATE	REVIEW DATE
	Corporation Board		29 th January 2024	29 th January 2027
LEAD PERSON		Chief People Officer		
EQIA DATE		29 th January 2024	DPIA DATE	29 th January 2024

PROFESSIONAL CONDUCT POLICY

Policy Statement

This policy provides a clear framework for all employees within Activate Learning, whether directly employed or otherwise, on the expected standards of personal behaviour and conduct at work.

Purpose

All employees are ambassadors for the Activate Learning group and are responsible for upholding its reputation and brand identity. When staff members come into contact with people during the course of their duties, their conduct and personal behaviour significantly influences the impression they have of the group and so shapes its reputation.

Activate Learning strives to maintain a professional, supportive and harmonious work environment for its staff and a learning environment for its students in which honesty, integrity and respect for all members of the Activate Learning community is demonstrated and reflected in the personal behaviour and standards of conduct by all.

Scope

This policy applies to all employees, volunteers and workers of Activate Learning. The policy covers areas including Health and Safety, Safeguarding, dress code, professional relationships, privacy, whistleblowing and GDPR, conflicts of interest, gifts and hospitality, and bribery and corruption but is not exclusive to those areas and requires employees to consider all aspects of their behaviour and conduct that might impact on their role and the organisation.

Responsibilities

All employees are expected to act and behave in accordance with this policy and to lead by example to others. All managers are also expected to provide feedback on the positive aspects of behaviour and conduct seen along with supporting employees to improve aspects of behaviour and conduct that are not at the required standard. All managers and employees should ensure they are clear on what is expected and to support continuous improvement where this might be deemed appropriate.

Equality, Diversity and Inclusion

Activate Learning has a firm commitment to equality and diversity and inclusion. We are committed to eliminating discrimination, harassment and victimisation and advancing equality of opportunity. All members of staff and students, regardless of their age, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex, socio-economic status or any other factor will be supported and encouraged to perform to their potential.

To secure an environment in which we will not tolerate harassment or bullying of one member of our community by another, including learners, staff, volunteers, members of the public and contractors. All staff should familiarise themselves with the Equality and Diversity Policy. The Grievance Procedure can be used by staff who feel they are experiencing unacceptable behaviour by other staff and the Complaints Procedure can be used by students or external customers. The organisation may also instigate the Disciplinary Procedure where it is felt staff are showing unacceptable behaviour and will take action against inappropriate behaviour which shows a lack of respect for others or which leads people to feel threatened.

Workplace Health and Safety

You are required to read and familiarise yourself with the Health, Safety and Environment Policy and all risk assessments, safe systems of work and required protective equipment for the area / role in which you work. These can be found on SharePoint.

You should also ensure that whilst in the workplace you ensure the safety of yourself and others, and do not participate in any activity that would put yourself or others at risk. For example, misuse of drugs and alcohol and should read the Misuse of Drugs and Alcohol Procedure.

Safeguarding

Activate Learning takes its safeguarding responsibilities very seriously. Safeguarding is the responsibility of all members of our community and you should take time to read our Safeguarding Policy and understand your responsibilities. All safeguarding concerns are recorded including those that do not meet the harm threshold (Low Level Safeguarding concerns). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease - that an adult working in or on behalf of Activate Learning may have acted in a way that is inconsistent with the Professional Conduct Policy, including inappropriate conduct outside of work, and which does not appear to meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Information on reporting is contained within the Disciplinary Procedure and all staff should familiarize themselves with this process.

Conduct Outside of Work

Where any employee gains a criminal conviction during their employment they should ensure they inform their line manager. Should this conviction or any other activity such as an arrest impede on an employee's ability to undertake their role then Line Manager and HR must be notified immediately. Further action may need to be considered. Any unlawful, anti-social or other conduct by employees which may jeopardise Activate Learning's reputation or position will be dealt with through the disciplinary procedure.

Privacy and Data Protection

Activate Learning has detailed privacy policies related to the collection, storage, use, transmission and retention of individuals' personal data. All employees are required to familiarise themselves with these policies, attend training events related to privacy and data protection, always act in accordance with the provisions of our policies and report any breach of privacy immediately.

Confidentiality, Copyright, Inventions and Patents

Your contract of employment details your responsibilities in respect of these areas. Please ensure you fully understand your responsibilities and comply with them.

Conflicts of Interest

You must not put yourself in a position, either inside or outside work, where your personal interests conflict or may be perceived to conflict with Activate Learning's business interests. For example doing anything that might mean you stop being independent or objective, or that could lead to our students, customers, suppliers or fellow colleagues losing confidence in our integrity.

If you are involved in any activity or relationship, including personal relationships that could lead to a conflict of interest, you must inform your manager and to Governance and Compliance to ensure that the interest is entered on the Register of Interests.

Conflicts of interest relating to the proceedings of the Corporation will be managed under the Conflicts of Interest procedure, and any staff attending a meeting of the Corporation or any of its committees should familiarise themselves with the contents of that policy in advance of the meeting.

Gifts, Hospitality, Anti-Corruption and Bribery

Activate Learning promotes the highest professional standards and expects all members of the Activate Learning community to act in the same manner. Always be professional, honest and fair with customers, students, suppliers and other colleagues.

Employees should read Activate Learning's Gifts and Hospitality Procedure as well as the Anti-Corruption and Bribery Procedure.

Abuses of Email/ Internet and Social Media Usage

You are required to read and adhere to the IT Services Acceptable Use Policy. This policy outlines your responsibilities when using any of Activate Learning's IT equipment or networks, whether you are onsite or

using equipment or accessing networks from outside. Whilst we encourage the use of technology to improve our business and administrative systems and to aid communications, unauthorised and/or inappropriate use of Activate Learning's email and intranet system or inappropriate postings on social media networks during the course of employment may lead to disciplinary action.

Finally you must not use Activate Learning's equipment or network to view, transmit, store or display offensive, indecent or obscene material. Any such action will be treated as an act of gross misconduct.

Behaviour outside of the workplace which brings the organisation into disrepute or which calls into question the individual's suitability to work with children or vulnerable adults will be considered as a disciplinary matter.

This includes an individual's use of social media. You should not issue your personal details to students such as home or mobile phone number and personal email addresses, or allow acceptance onto student's personal networking sites.

Dress and Appearance

Activate Learning expects all employees to present a professional image at all times. This can be affected by a number of factors, including standards of dress and personal appearance. Being well presented is part of being professional, inappropriate dress or an unkempt appearance gives an impression of inefficiency, can cause offence and may be interpreted as disrespectful by members of the public, visitors and students.

Staff do not necessarily have to wear formal business wear and in some of the more 'practical' areas of the business more appropriate dress for the area is perfectly acceptable. However, whilst this code acknowledges that some staff may prefer to dress less formally they are reminded that as representatives of Activate Learning they need to present a smart image at all times. Whilst many items of 'fashion' clothing may be acceptable in a social or informal setting, they may not be considered to promote a professional image or to be appropriate for a place of business. In the professional work environment excessive facial or other visible piercings may not be acceptable; body art, tattoos, etc. should be kept covered particularly where this contains statements or depicts images likely to cause offence.

All employees, contractors and visitors are required to wear and display their lanyard during working hours. If work or corporate clothing or uniform is provided, e.g. overalls or branded clothing, this must be worn as confirmed by the line manager. Failure to wear uniform, other provided clothing or to comply with the dress code requirements may result in disciplinary action.

Activate Learning values and welcomes diversity in its workforce and will take account of ethnic and religious dress requirements with sensitivity by ensuring that employees are free to observe them where this does not compromise health and safety or security requirements.

Professional Boundaries and Accountability

Governors, parents and other stakeholders have legitimate expectations about the nature of staff professional involvement in the lives of students. When individuals accept a role that involves working with young people, students and vulnerable adults, they need to understand and acknowledge the responsibilities and trust inherent in that role.

For this reason Activate Learning employees should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, you should exercise your professional judgement in making a response and be aware that such social contact could be misconstrued.

All employees must be aware and recognise the importance of maintaining appropriate professional boundaries when dealing with students and always act, and be seen to act, in the student's best interests and ensure that your actions would not lead any reasonable person to question your motivation and intentions.

Speaking Up

Activate Learning promotes a culture of high ethical standards and it is responsibility of every member of the Activate Learning community to promote and uphold our code of conduct. If you have real concerns that another employee might be acting fraudulently or dishonestly, tell your manager, an HR team member or a senior manager straight away. Alternatively you can use the Activate Learning Whistleblowing Procedure.

References

- Equality and Diversity Policy
- Grievance Procedure
- Disciplinary Procedure

- Recruitment Policy
- Safeguarding and Child Protection Policy
- Health, Safety and Environment Policy
- Corporate Ethics Policy
- Gifts and Hospitality Procedure
- Conflicts of Interest Procedure

- Anti-Corruption and Bribery Procedure
- Whistleblowing Procedure
- IT Services Acceptable Use Policy
- Information Security and Data Protection Policy
- Customer Compliments, Comments and Complaints Procedure