



Code of Conduct

Eastern Region Training Group Ltd

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Approved by:	<i>Clive Coote Managing Director</i>
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Introduction

As Managing Director, I have every confidence in my staff to work and behave in a professional manner.

As an organisation we must demonstrate that we are committed to working to the highest standards and these are outlined below so our customers, stakeholders, partners and fellow colleagues know what to expect from us when working with or visiting Eastern Region Training Group (ERTG)

Eastern Region Training Group expects the highest ethical standards from its employees in carrying out its business. This Code of Conduct (the Code) sets out those standards by which all employees are bound.

It provides guidelines on the required behaviour in a wide range of situations, including social events and out of hours activities that directly reflect on the reputation of ERTG. It also refers to the relevant supporting policies that relate to our business.

It is the responsibility of all employees to familiarise themselves with the details of the Code and its guidance. If any employee has any queries or concern about the behaviour of others toward them or how they should behave, they should contact Clive Coote, Managing Director at any time, including out of hours.

The Code applies to all employees, temporary staff, agents and contractors.

All staff should follow the guidance in this important document.

The Purpose and Principles of the Code

The Code describes the principles by which ERTG expects its employees to conduct its business.

It sets out the required standards of behaviour for its staff in carrying out this business. The Code deals with a wide variety of issues and situations relating to workplace conduct, but it is not intended to be exhaustive.

This Code of Conduct sets out principles by which ERTG is bound. These principles are as follows.

- We comply with laws and regulations.
- We reject bribery and corruption and avoid being compromised by gifts and entertainment.
- We avoid conflicts of interest.
- We respect the confidentiality of personal and corporate information.
- We promote diversity and equality and treat people fairly and with respect.
- We maintain a safe and healthy environment for people to work in and are proactive in managing our responsibilities to the environment.
- We support those who have any suspicions of any misconduct, malpractice, illegal or unethical behaviour and report their concerns in confidence to the appropriate channels.

These principles are outlined in more detail in the Code below. Several of the principles and standards outlined in the Code are supported by more detailed specific policies which can be located on the ERT drives. These policies are referred to in the Code.

Zero Tolerance

While this Code gives guidance to employees in certain situations, there are specific areas where ERTG has a policy of zero tolerance. These are:

- unsafe, illegal or unethical working practices
- violence and aggression
- discrimination, bullying and harassment.
- bribery and corruption
- retaliation or action against anyone who speaks up and, in good faith, reports a wrongdoing.

Breaches of the Code

This Code of Conduct has been drawn up to provide guidance on conduct for staff of ERTG.

For the avoidance of doubt, it is not a contractual document and *ERTG* reserves the right to amend it at any time. The Code will be subject to regular review, particularly in the light of new and relevant legislation.

Any breach of the Code will be considered a disciplinary matter, which could result in disciplinary up to and including dismissal.

Code of Conduct: Guidance

The guidance in this Code of Conduct is organised into separate sections.

- Financial probity.
- Data protection and IT.
- Standards of personal behaviour.
- Environment.
- Raising concerns through confidential reporting.

As already mentioned, several of the principles outlined in this Code are supported by more detailed policies found on the ERT drives. Reference to the relevant policy is given at the end of the guidance. All employees are required to comply with these policies.

Financial Probity

Compliance with the law

ERTG business and employees (and all others to whom this Code applies) must observe UK laws and regulations.

Employees who raise concerns about whether conduct complies with the law and with the Code should immediately bring it to the attention of their manager. It is ERT policy that staff who raise concerns in good faith shall not suffer any kind of punishment or retaliation.

Bribery and corruption

ERTG does not permit, in accordance with the provisions of the Bribery Act 2010, the bribery of any person involved in its business. Employees must not authorise, offer, promise or pay or receive a bribe designed to secure an unlawful advantage. The amount of the bribe is irrelevant.

In some circumstances, excessive hospitality or gifts may be regarded as offering or receiving bribe. An employee should always check with their line manager if in doubt.

Fraud

Fraud is not tolerated in ERTG. Any attempt to secure an unlawful gain will lead to disciplinary action and sanctions up to and including dismissal. A report will also be made to the relevant authority which could lead to prosecution.

ERTG will always seek to recover loss resulting from fraud.

Conflict of interests

It is important that, where decisions are made which have a significant effect on ERTG and others, they are taken in a fair and balanced way. Any potential conflicts of interest must be declared so that individuals are not involved in decisions that could be regarded as biased.

Data Protection and IT

Data protection

The General Data Protection Regulation and the Data Protection Act 2018 comprise the data protection regime that applied in the UK from 25 May 2018. This regime supersedes any previous legislation.

ERTG holds and processes information on its staff and other data subjects for commercial and administrative purposes. It will only collect and handle data for “legitimate interest” and in compliance with the data protection regime above.

For further information, employees should refer to the *Data Protection* policy.

Confidentiality

ERTG is committed to the maintenance of the highest level of integrity in all its dealings with clients, customers and staff. This extends not only to commercial confidentiality but also to the protection of personal information received in the process of providing a service.

Social media

Employees may use social media for work purposes (such as LinkedIn) or for personal use (for example, Facebook). [Employees should not access social media for personal purposes during working hours.]

Any use of such social media must be respectful of ERTG reputation and that of all its staff. Employees must not disclose confidential information when using personal social media.

For further information, employees should refer to the *Social Media* policy. Failure to comply with this policy is a disciplinary offence. It may amount to gross misconduct and could result in summary dismissal.

Equality, diversity and inclusion

An important core value of ERTG is the promotion of inclusivity and diversity. It seeks to ensure that the workplace is supportive of its staff and one where individual respect is shown to all members of staff, regardless of age, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual

orientation, religion or belief, sex or any other factor. All staff will be supported and encouraged to perform to their potential.

For further information, employees should refer to the *Equal Opportunities* policy.

Bullying and harassment

ERTG has zero tolerance to bullying and harassment.

Disciplinary action will be taken against inappropriate behaviour that shows lack of respect for others or causes people to feel threatened.

For further information, employees should refer to the *Bullying and Harassment* policy.

Standards of Personal Behaviour

(Conduct outside work)

As a rule, what employees do after working hours and away from the premises is a personal matter. However, ERTG will become involved in the following circumstances.

- At office parties, drinks events and other work-related social occasions.
- At third-party (that is, clients and customers) occasions where the employee has been invited in their capacity as an employee and representative of ERT.
- At work-related conferences and training courses.
- Where the employee is away on business on behalf of ERT.

ERT policies will continue to apply at all these events. An employee should not bring ERT name into disrepute. Improper behaviour will lead to investigation and possible disciplinary action, including dismissal and in cases of gross misconduct, a summary dismissal.

For further information, employers should refer to ERT *Disciplinary and Grievance Procedures*.

Relationships with other members of staff, Students, Apprentices and Contractors

ERT does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation.

Members of staff who are relatives or who have a close personal relationship will be expected to ensure they apply the same rights and responsibilities to within known relationships as any staff member.

The Managing Director will, as a necessary part of his role, supervise and assess all staff, whether a relative or within a close personal relationship, to the standards outlined in all policies relating to Human Resource Management.

Employees must inform their line manager if they have a close personal relationship with another employee or contractor which could be considered by colleagues or other, as impacting on the way they conduct themselves at work.

Staff are expected to have a professional and appropriate relationship with students and Apprentices within the context of that Employee's role. Any close personal relationships developed with Students or Apprentices, outside of the expected role, will be considered a safeguarding issue. Any identified issue will be investigated as per the complaints about Staff Policy or Disciplinary and Grievance Policy. Any proven allegations could result in summary dismissal.

Staff with a close personal relationship, are expected to conduct themselves in a professional manner, observing office etiquette in terms of acceptable behaviour at work. For clarity, acceptable and unacceptable behaviours are outlined below: -

Good office etiquette includes but is not limited to...

- Asking permission before opening windows etc
- Not bringing strong smelling food into the general office.
- Taking emergency phone calls away from your desk.
- Wearing headphones for Teams calls of online training.
- Respecting each other's personal space.

Behaviour not considered good office etiquette includes but is not limited to...

- Making unsolicited jokes, comments or having conversations that are offensive or of a sexual nature
- Practical joking
- Exclusive huddles at desks or away from the main office for informal conversations or playfighting
- Gossiping or rumours about other staff
- Belittling or undermining colleagues

Work time should be used to fulfil business needs and any personal matters or interests should be conducted outside of business hours. As per employee contracts, any conduct that is found to breach this contractual expectation will be considered a disciplinary matter.

Criminal offences

For the avoidance of doubt, an employee must inform their manager in writing if they are under investigation for a criminal act (including road traffic offences) or have been arrested in connection with a criminal action. They must also inform their manager in writing if they have been found guilty and convicted of any offence or received a police caution. Failure to disclose this information may be treated as a disciplinary offence.

Furthermore, if an employee commits a criminal offence outside employment, ERT will investigate the matter to ascertain whether there is any connection between the offence and the individual's employment. If there is an adverse finding in this respect, this could result in the employee's dismissal under the disciplinary procedure.

Health and safety

ERT places a high priority on providing a safe workplace and minimising the risks identified by the Health and Safety at Work Act 1974 and associated legislation.

Effective safety management requires the active involvement of every employee, and every employee has a legal duty to look after their own health, safety and welfare and that of those around them.

Employees should refer to ERT *Health and Safety* policy for further information.

Environment

ERT is committed to preventing, or, at the very least, minimising, any harmful effects it causes to the natural environment. It encourages all employees to conduct their work in accordance with the highest environmental practices and the minimising of waste.

Raising Matters of Concern: Confidential Reporting Procedure

Employees who become aware of activities which they believe, in good faith, are illegal, improper, unethical or otherwise inconsistent with this Code, may report the matter (often known as “whistleblowing”) to Clive Coote in accordance with the requirements of the Public Interest Disclosure Act 1998.

Any individual who raises such a concern in good faith and in line with ERT whistleblowing policy will not suffer any detriment or be penalised in any other way.