



Employee Code of Conduct Policy

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Owner: Quality and Compliance Manager	Location: Shared Drive: WREC Documents\Policies and Procedures 2023	

1. Introduction

- 1.1. The public is entitled to expect the highest standard of conduct from all Whitehead-Ross Education & Consulting (WREC) employees so they have complete confidence in the Company. This code is to make sure that you understand the standards of behaviour and conduct we expect of you.
- 1.2. The code includes new as well as existing policies and requirements, but it isn't exhaustive. It gives examples of the type of conduct we expect but it may depend on particular circumstances so, if you are not sure, ask your manager.
- 1.3. It is important that you read the code and ask about anything that isn't clear.
- 1.4. We wouldn't accept ignorance as a defence if WREC decided to take disciplinary action against you for not complying with these standards.

The code covers:

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2. Your role as an employee of WREC

- 2.1. WREC provides a service to members of the public, vulnerable children and adults and employers. The role of all employees of WREC is to serve the public in the best way possible.

3. Principles of conduct

- 3.1. These principles of conduct set out how WREC expects you to behave when doing your job. We have expanded on some of them in later sections.

Leading by example - promote this principle by behaving in a way that gives people complete confidence in the services provided by Whitehead-Ross Education & Consulting.

Uphold the law - you have a responsibility to uphold the law, and to act in line with Whitehead-Ross Education & Consulting, and the people it serves, places in you.

Constituency - you have a responsibility to help Whitehead-Ross Education & Consulting to act in the interests of the whole community that it serves, as far as possible.

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Public interest - you must never use your position to make gains for yourself, family, friends or others. This includes financial benefits, preferential treatment or any other advantage.

Honesty, integrity and propriety - you must not get in a position where your integrity could be questioned by a financial or any other obligation. As well as avoiding actual impropriety, you must be **seen** to avoid it so that your honesty and integrity is beyond question.

Gifts and hospitality – the golden rule is that you shouldn't accept gifts or hospitality. Even with the best of intentions, people could think gifts or hospitality might influence, or be intended to influence, your judgment. There are exceptions though so there is more information in section 17.

Objective decisions – any decision you make in your job must be made solely on merit, including appointing someone, awarding contracts, or recommending people for rewards or benefits.

Accountability - you are accountable for your actions and for your part in making decisions, so you must cooperate with whatever scrutiny is appropriate to your post.

Openness - you must be as open as possible about your actions and your part in reaching decisions and seen to be open so that people are confident there is nothing underhand about your conduct.

Confidentiality - you must make sure that you handle anything confidential, including information about others, in accordance with the law; you must not use it for private purposes.

Resources - you have a responsibility to make sure that Whitehead-Ross Education & Consulting uses its resources prudently and in accordance with the law.

Declarations - you have a legal duty to declare any private interests relating to your employment and to resolve any conflicts that may arise.

Relations with colleagues - respect other employees, always treating them with mutual respect.

4. Customer care and courtesy

4.1. We expect you to be welcoming, helpful, informative and courteous as well as being professional to the public and to our internal and external clients.

4.2. You must be presentable and suitably dressed for your particular job, including wearing safety clothing and equipment, if appropriate to your duties, under Health and Safety regulations.

4.3. Your own programme may have its own customer care requirements, which you must follow in addition to these corporate guidelines.

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5. Conduct towards colleagues

- 5.1. You must always act in a polite and friendly manner to colleagues, making sure that your behaviour does not cause offence.
- 5.2. WREC will not tolerate any form of bullying, oppression, sexual harassment, violence or aggression and will use its Disciplinary Policy to support this.

6. Timekeeping and attendance

- 6.1. We expect you to be ready and able to carry out your duties at agreed times, within reason.

7. Complying with written guidelines, laws and regulations

- 7.1. Make sure that you comply with, the laws and regulations relevant to your job which you are aware of or are told about. If in doubt, get advice.
- 7.2. Make sure that you understand the conditions of service under which you are employed. Ask your manager for clarification about anything you're not clear about.
- 7.3. You must also comply with corporate guidance, such as contract requirements, as well as any specific programme guidelines.
- 7.4. You, together with all employees, have a responsibility to contribute to developing new procedures and to respect them when they are in place.
- 7.5. If you are a member of a professional institute or association, you are also obliged to comply with the professional code and standards of practice relating to that organisation.

8. Conduct and disciplinary action

- 8.1. WREC will use its disciplinary process to deal with any conduct that falls below that expected, if serious. Full details of misconduct and gross misconduct are in the Disciplinary Policy and Procedures, but here are some examples:
- 8.2. Misconduct examples could be:
 - refusing a reasonable instruction
 - unauthorised absence
 - abusing the sickness procedure
 - failure to report the offer of a bribe or inducement
- 8.3. Gross misconduct examples could be:
 - stealing property or money from WREC or other employees
 - deliberately falsifying time sheets or other records
 - fighting, intimidation or physical assault at work
 - disclosing confidential or exempt information
 - gross dereliction of duty i.e., action or inaction which leads to unacceptable loss, damage or injury
 - accepting bribes or inducements

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9. Outside interests

- 9.1. Your life away from work is your own concern but you must not put yourself in a position where your job and your personal interests come into conflict. This includes behaviour which, because of the nature of your employment, would undermine WREC's confidence or trust in you.
- 9.2. An example would be if you are facing criminal charges, regardless of whether these were incurred on or off duty. You must tell your manager immediately if the charges are in any way relevant to your employment, such as drug offences, crimes of violence, dishonesty or driving offences if your job involves the use of a vehicle. If you are in any doubt about this, consult your line manager.

10. Additional employment

- 10.1. WREC will not stop you taking additional employment as long as it does not affect your duties and responsibilities or conflict with the interests of, or weaken, public confidence in WREC.
- 10.2. If you are thinking of taking on additional work, you must get permission from your manager beforehand, and we will maintain a record of approval. This conduct rule applies to any employment, paid or unpaid, for example taking up office in an outside organisation. This would include charities such as local community associations.
- 10.3. If you are paid for work which arises principally as a result of your work-related skills, you must not use assets or information belonging to WREC, without getting prior permission from the company director.
- 10.4. You must also make sure that any customer realises the private nature of the work you are doing, which is in no way connected to the business of Whitehead-Ross Education & Consulting.
- 10.5. You must declare any income received to HM Customs and Revenues, but you do not have to inform your Manager as well.

11. Declaring interests, including financial or other interests in contracts

- 11.1. If a conflict of interest, or even a potential conflict, arises during the course of business, you must declare it immediately. The Managing Director will then consider whether it is appropriate for you to take any further part in the matter.
- 11.2. An example of a direct interest would be if you or your partner was involved with the contract. Indirect interests can relate to close family members or friends being involved in contracts.
- 11.3. The responsibility to declare an interest lies with you. If it came to light later, you could be challenged for not disclosing it earlier. You must also consider whether others would consider whether there is a direct or indirect conflict of interest. If you have any concerns about actual or potential conflicts of interest, discuss them with your line manager straight away.
- 11.4. When you do declare an interest, it must be recorded in the register of interests held by the Managing Director.

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12. Confidentiality and use of information

- 12.1. In your job you will come across confidential information. You must maintain the privacy and confidentiality of such information at all times, unless you are expressly authorised to divulge it, or are required to do so by law.
- 12.2. You must not supply information about another employee's private affairs to anyone outside Whitehead-Ross Education & Consulting without the consent of the employee, nor to anyone within Whitehead-Ross Education & Consulting unless that person has authority or responsibility for such information.
- 12.3. You must not use WREC contracts or arrangements for personal benefit or to benefit any external function or organisation unless you get approval from the Managing Director beforehand.
- 12.4. You must not divulge any business information, for example unit costs, work plans, best value information, quality assurance documents and so on to any third party or use it other than for the purpose of furthering the interests of WREC.
- 12.5. You must not disclose the proceedings of any WREC meetings unless you are legally required, or have been authorised, to do so. If you are obliged to disclose information, you must make sure that it is accurate.
- 12.6. If you have any reservations about any request to supply information, refer it immediately to your line manager.

13. Caring for and using Whitehead-Ross Education & Consulting resources

- 13.1. You may not use Whitehead-Ross Education & Consulting resources, whether tangible assets such as materials, equipment and cash or business information such as trade secrets, other than for Whitehead-Ross Education & Consulting business.
- 13.2. You must take good care of all Whitehead-Ross Education & Consulting equipment. If you wish to use something or make equipment available to someone else for non-Whitehead-Ross Education & Consulting business, you must get permission from the Director in advance.

14. Computer security and data protection

- 14.1. The information stored and processed on Whitehead-Ross Education & Consulting information technology systems is of paramount importance to its day-to-day activities. Consequently, it is essential that the data and systems are adequately secured against risks such as operator errors, equipment theft, unauthorised access to or copying of programmes, use of unauthorised software on Whitehead-Ross Education & Consulting machines - which increases the risk of importing computer viruses - and natural hazards such as fire, flood and power failures.
- 14.2. You must comply with the Data Protection Act, which requires all users of personal data to register with the Data Protection Registrar and comply with the eight Data Protection Principles, and the 1990 Computer Misuse Act 1990, which seeks to secure computer material against access or modification.

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14.3. You must make sure that no unauthorised person gains access to equipment or data that you are responsible for.

14.4. You must not disclose your user password to any external contacts who are not associated with Whitehead-Ross Education & Consulting.

15. Patent and copyright

15.1. Patent:

- You must tell your manager about any issue, item or idea capable of being patented under the Patents Act that you develop or discover, on your own or with colleagues, in the course of your duties. Subject to the provision of the Act, anything like this belongs to WREC.

15.2. Copyright:

- All records, documents and other papers that you compile or acquire in your job relating to Whitehead-Ross Education & Consulting finance and administration are Whitehead-Ross Education & Consulting property together with the copyright.
- However, the copyright will belong to you of any academic work you do, such as projects you do as part of a course to further your professional career, including books, contributions to books, articles and conference papers.

16. Accepting gifts and hospitality

16.1. You must be very careful about accepting any offer of a gift or hospitality, but you can accept items of low intrinsic value, such as diaries and calendars, if used at work.

16.2. You can also accept reasonable hospitality, such as a working lunch, but you must record it. You must decline, politely but firmly, anything of greater value or significance - taking care not to give offence by explaining why, as a Whitehead-Ross Education & Consulting employee, you may not accept. Even when you decline offers, you must record them in the appropriate gifts and hospitality registers.

17. Foreign travel

17.1. You must seek approval in advance from the Managing Director for all foreign travel on Whitehead-Ross Education & Consulting business. Once approved, details of all foreign travel must be recorded in the register maintained by the Managing Director.

18. Alcohol and drugs

18.1. Alcohol is not permitted on Whitehead-Ross Education & Consulting premises, unless specifically approved by your manager.

18.2. Whitehead-Ross Education & Consulting prohibits the use, possession, distribution or sale of illicit or illegal drugs at work, or when doing Whitehead-Ross Education & Consulting business and will report any such activity to the Police.

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18.3. We may use the disciplinary procedures to deal with any unsatisfactory performance, attendance or behaviour caused by excess alcohol consumption or by drugs, depending on circumstances.

18.4. We view alcohol and drug dependency problems as medical cases, and managers will provide help, whenever possible.

19. Smoking at work

19.1. Employees are not permitted to smoke in Whitehead-Ross Education & Consulting premises, employees must smoke away from the building or open windows or doors to prevent the smell entering the premises.

20. Whistle blowing - reporting criminal offences and poor conduct

20.1. You are expected to report any suspected cases of fraud, irregularity or conduct issues to the Managing Director.

21. Anonymity

21.1. Any information you provide in good faith will not lead to disciplinary action being taken against you, but we will treat any malicious reports very seriously.

21.2. If you were identified as participating in fraudulent activities disciplinary action would follow.

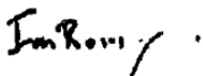
22. Dealing with the media

22.1. You may only talk to the media as a representative of Whitehead-Ross Education & Consulting if you have been specifically authorised to do so. The Managing Director will deal with all media enquiries as well as preparing and issuing public statements or press releases.

23. Equality issues

23.1. Your behaviour should accord with the spirit and the detail of Whitehead-Ross Education & Consulting Equality and Diversity Policy. We will not tolerate racist, sexist, homophobic and other discriminatory remarks and behaviour. Deliberate discrimination will result in disciplinary action.

Signed:



Ian Ross
Managing Director

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