

Employee Code of Conduct

PURPOSE

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

Only through the observance of such standards can NTG Training effectively and efficiently serve its external and internal clients.

The relationship between NTG Training 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 NTG Training and anyone working within it on a voluntary or placement basis.

It is the responsibility of all members of the NTG Training's working community to familiarise themselves with, and adhere to, all of the NTG Training'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 the NTG Training's disciplinary procedure. Such disciplinary action may include dismissal depending on the circumstances.

All employees 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 NTG Training values. This includes being professional at all times, 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 the NTG Training'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.



The NTG Training's absence management procedure 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 NTG Training 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.

The NTG Training's drug abuse policy and procedure outlines the standards expected of all the NTG Training's working community in relation to drug and alcohol use and abuse, and provides guidance on managing issues related to such use and abuse and the action that will be taken by NTG Training in instances of noncompliance.

BULLYING AND HARASSMENT

NTG Training 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 through the anti-harassment, bullying and dignity at work procedure and the NTG Training's disciplinary procedure as appropriate.

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

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

CONFIDENTIALITY

All members of the NTG Training's working community have a personal responsibility to protect and maintain the confidentiality of both the business and client information. The disclosure of confidential information relating to NTG Training 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 (including statements made between or to Trade Union Representatives) 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.

Full details of the covenants by which employees are bound in respect of confidentiality are outlined in their contracts of employment.

A breach of confidentiality may result in disciplinary action being taken against the employee/s responsible in accordance with the NTG Training's disciplinary procedure.

Any confidential data taken off-site must be securely stored

Staff should familiarise themselves with the NTG Training's data protection policy and Data Protection Act factsheet.

DRIVING IN PURSUIT OF BUSINESS ACTIVITY

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

There may also be occasions on which employees are required to either drive their own vehicle in pursuit of the business or other activities. Individuals should refer to the Health and Safety Manual for more detailed information.

SUITABILITY TO WORK WITH CHILDREN AND VULNERABLE ADULTS

NTG Training works in line with 'Keeping Children Safe in Education July 2025'

DISCLOSURE AND BARRING SERVICE (DBS) CHECK NTG Training is committed to adhering to the DBS's Code of Practice.

Roles at NTG Training 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 NTG Training upholds its duty of care to protect vulnerable groups who access NTG Training. Failure to co-operate with a reasonable request on the part of NTG Training to obtain a DBS check may result in disciplinary action being taken in accordance with the NTG Training's disciplinary procedure.

POLICE ENQUIRIES OF CURRENT EMPLOYEES

All employees have an obligation to inform NTG Training if he or she are the subject of criminal investigations, charges, cautions, warnings or convictions. 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 NTG Training 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 NTG Training. 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. NTG Training 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 Quality Manager – Safeguarding lead. In his/her absence, this will be followed up with the deputy Safeguarding officer. The matter will then be referred to the local authority designated officer in line with Keeping children safe in education, July 2025.

Where staff have any safeguarding concerns about another member of staff these concerns must be reported immediately to the Quality Manager – Safeguarding lead.

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 September 2023' guidance.

PERSONAL RELATIONSHIPS Staff -Learners

Employees in a position of trust must not enter personal relationships with any learner of any age 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.

It is vital that staff work within appropriate professional boundaries at all times with children and young people with whom they are in a position of trust.

Relationships that existed prior to the employment or enrolment between two consenting adults must be declared to the quality manager, this will prevent any damage to the integrity to the educational programme. NTG Training will put in place appropriate arrangements to ensure that the learner's learning and assessment is free from bias and the staff member will have no input into the learner's educational journey. NTG Training will also advise the member of staff and learner that their relationship should be conducted entirely away from the workplace. 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 the NTG Training's disciplinary procedure. Staff must not make contact with learners through their personal social media accounts. All staff must act in accordance with the safer working practices document.

Between Staff

If you perceive that a personal relationship you have with a colleague may give rise to a professional conflict/compromise you should bring this to the attention of your Line manager. This applies equally to relationships that existed prior to employment and to relationships that develop whilst at NTG Training. Such disclosures must be treated with respect, dignity and in confidence; however, it may be necessary for the line manager to discuss with their line manager but this will be on a strictly need-to-know basis and will be discussed with the employee in the first instance. 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.

Staff – Client/service

If you perceive that a personal relationship you have with a client or service provider 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 NTG's regulations (including but not limited to its financial regulations), members of the NTG Training'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 NTG Training 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. Some roles necessitate employees to wear items of protective clothing in the interests of health and safety. Such items should be worn at all times as required.

EQUALITY AND DIVERSITY

NTG Training 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 the NTG Training'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 NTG Training and such conduct may result in disciplinary action being taken in accordance with the NTG Training's disciplinary procedure.

BRIBERY ACT 2010

NTG Training 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 the NTG Training'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.

NTG Training 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 the NTG Training's behalf in order to gain any commercial, contractual or regulatory advantage for NTG Training 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.

Individuals should discuss with their Line Manager if at any time they are in doubt as to whether a potential act constitutes bribery. If necessary, guidance can be sought from the Director of Finance. Related policies and procedures are anti-fraud policy and fraud response plan, financial regulations, whistleblowing policy and risk management policy and procedure.

FINANCIAL REGULATIONS

NTG Training has established financial regulations which govern all activity associated with the NTG Training's approach to financial management and control. All employees have an individual responsibility to uphold and apply in practice these regulations and any breach of them will be addressed in accordance with the NTG Training's disciplinary procedure.

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), with the exception of 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 NTG Training is committed to promoting and implementing all relevant health and safety legislation and recognises that the highest priority must be given to safe methods of work at all times.

Employees must familiarise themselves with the NTG Training's Health and Safety Policy and Health and Safety Manual 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 the NTG Training's health and safety rules or regulations or its Health and Safety Policy will be viewed extremely seriously by NTG Training and may constitute gross misconduct in accordance with the NTG Training's disciplinary procedure.

DAMAGE TO PROPERTY

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

THEFT

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

USE OF INFORMATION TECHNOLOGY

All employees have an individual responsibility to uphold and apply in practice the NTG Training's e-mail and internet policy. Breaches of the e-mail and internet policy will be addressed in accordance with the NTG Training's disciplinary procedure.

SUSPENSION OF STAFF

Suspensions should not be automatic. In respect of staff, suspension can only be carried out by the Senior Management Team.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of or withdrawal from specified duties.

Suspensions should only occur for a good reason: For example:

- Where a child, young person/vulnerable adult is at risk.
- Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of misconduct.
- Where necessary for the good and efficient conduct of the investigation

If suspension is being considered, the member of staff should be encouraged to seek advice, for example, a trade union.

Prior to making the decision to suspend, the Senior Management Team should interview the member of staff. This should occur with the approval of the appropriate agency, if the police are engaged in an investigation, the officer in charge of the case should be consulted.

The member of staff should be advised to seek advice and/or assistance from his/her trade union (if any) and should be informed that they have the right to be accompanied by a friend.

The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview the member of staff should be provided with as much information as possible, in particular the reasons for any proposed suspension, provided that in doing so it does not interfere with the investigation into the allegation.

The interview is not intended to establish the member of staff's innocence or guilt but to provide the opportunity for the member of staff to make representations about possible suspensions. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response

If the Senior Management Team considers that suspension is necessary the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension with reasons shall be dispatched as soon as possible, ideally within one working day.

SMT are required to be informed for the reason for suspension and are to maintain confidentiality regarding the allegations.

The Line Manager shall consider carefully and review the decisions as to who is informed of the suspension and investigation. External investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension will remain under review in accordance with internal disciplinary procedures.

DISCIPLINARY INVESTIGATION

The disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

The member of staff will be informed of:

- The disciplinary charge against him/her
- His/her entitlement to be accompanied or represented by a trade union or a friend.

Where the member of staff has been suspended and no disciplinary action is to be taken the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The individual making the allegation and /or their parents and carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return of the member of staff if suspension has occurred.

Consideration to what information should be made available to the general population of the centre should be made by SMT.

Allegations without foundation:

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given for a referral to be made to external safeguarding authorities so they may act upon it.

Further to this:

- The member of staff against whom the allegation is made is to be informed orally and in writing that no further disciplinary or child protection action will be taken. It may be appropriate to offer counselling.
- The parents/carers of the alleged victim are to be informed that the allegation has no foundation and advised of the outcome.
- A report is to be prepared outlining the allegation and giving reasons for the conclusion that the allegation had no foundation and confirming the above action has been taken.