



Staff Code of Conduct

Approved: 24 September 2021

Review Date: 26 September 2022 by SMT

1. Purpose:

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

The relationship between AccXel 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. Central to all we do should be our core values of honesty and integrity, responsibility and accountability, teamwork and collaboration and personal development.

2. Scope:

This code of conduct applies to all employees of AccXel and anyone working within it on a voluntary or placement basis. It is the responsibility of all members of AccXel's working community to familiarise themselves with and adhere to all of AccXel's rules and procedures. Failure to comply with the standards of performance and behaviour outlined in this document may result in disciplinary action in accordance with AccXel's disciplinary procedure. Such disciplinary action may include dismissal depending on the circumstances.

3. Attendance and Timekeeping:

Employees 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 AccXel's disciplinary procedure.

Hours or work are stated in each employee's Contract of Employment. Contracts of Employment and the Staff Handbook outline the standards expected of all employees and the procedures that should be followed during any period of absence. It also provides details of how AccXel will address and manage all issues related to time off work.

4. Alcohol and 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. If you are found in breach of the rules, you may be liable to instant dismissal on the grounds of gross misconduct under the Company's Disciplinary Procedure.

5. Bullying and Harassment:

AccXel 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 victimization.

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 Safeguarding Policy and Disciplinary Procedure as appropriate.

6. Equality and Diversity:

The company is committed to ensuring equality of opportunity for all its employees and learners alike.

All employees have a responsibility to uphold and apply in practice the company's Equality and Diversity policy and to conduct themselves in a manner consistent with that policy and with relevant legislation. Discrimination and prejudice will not be tolerated by AccXel and such conduct may result in disciplinary action being taken in accordance with the company's disciplinary procedure.

7. Health and Safety:

AccXel 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 company's Health and Safety policy 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 company's health and safety rules or regulations or its Health and Safety policy will be viewed extremely seriously by the company and may constitute gross misconduct in accordance with the company's disciplinary procedure.

8. Confidentiality, particularly information security management:

All members of AccXel's working community have a personal responsibility to protect and maintain the confidentiality of both AccXel and client information. The disclosure of confidential information relating to AccXel and/or its internal or external clients is prohibited, except as authorized or required by the law or in accordance with an employee's duties under his/her contract of employment.

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.

Please refer to the Data Protection policy for further details.

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

Any confidential data taken off site must be securely stored. Removal or sharing of all intellectual property of the company will be considered to be theft and dealt with accordingly.

9. Safeguarding: Disclosure and Barring Service (DBS):

AccXel is committed to adhering to the DBS code of practice to determine whether a basic, enhanced, standard or basic check is appropriate for roles. Roles within

DBS checks are undertaken to ensure that the company upholds its duty of care to protect vulnerable groups, but also to safeguard all learners who access AccXel. Failure to comply with a reasonable request on the part of the company to obtain a DBS check may result in disciplinary action being taken in accordance with AccXel's disciplinary procedure.

10. 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, and such items should be worn at all times as required.

11. Disclosure of interest:

In order to uphold fairness and consistency, and to comply with company regulations (including but not limited to its financial regulations), members of AccXel's working community must disclose any interests or relationships whether direct or indirect – that they have with any person, company or other organization involved with AccXel and/or its business and/or activities which may give rise to conflict/compromise.

12. Gifts and Hospitality:

In principle, there is nothing wrong with receiving or giving tokens of appreciation or accepting or giving reasonable and proportionate entertainment to consolidate a business relationship in accordance with The Bribery Act 2011. However, we need to be sensitive to the different norms and conventions in the business

community. Using good judgement and moderation, occasionally exchanging entertainment or gifts of nominal value with an individual or entity is appropriate unless the recipient's employer forbids the practice.

Never accept or offer gifts of cash or cash equivalents, such as gift tokens. Also, never accept or offer a gift that could be viewed as lavish. In such situations simply and politely decline the gift and explain that it's against Company policy.

If you are in any doubt about the appropriateness of a gift you should seek guidance from a Director. Similarly, any gift received that is more than a nominal value (£25) should be reported to a Director, even if considered appropriate – such practice avoids misunderstanding and extends the “expressed gratitude” from simply being a personal gift.

13. Bribery and Fraud:

All employees and associated persons are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity and must not commit fraud. AccXel values its reputation and ethical behaviour and has zero tolerance to bribery and corruption. Any bribery or fraud breach will contribute to a serious disciplinary offence which may lead to dismissal and become a criminal matter for 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 or fraud. If necessary, guidance can be sought from the Managing Director.

14. Financial Regulations:

AccXel has established financial regulations which govern all activity associated with the procurement and invoicing of goods and services on behalf of the company. 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 company's disciplinary procedure.

15. Personal Relationships

Staff-Learners:

Under the Sexual Offences Act 2003, it is an offence for anyone in a position of trust to engage in sexual activity (including touching of a sexual nature) with a person under the age of 18 who is in their care. The position of trust definition applies to all teachers and other staff in an educational setting. Such a breach of

trust is an arrestable offence, even if the activity and/or relationship is consensual. Anyone successfully convicted under this legislation will be subject to notification requirements under the Sex Offences Act 1997.

Employees in such a position of trust must not enter into personal relationships with any learner under the age of 18 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.

Relationships with learners who are vulnerable adults are prohibited. This type of relationship could be viewed as an abuse of employee's position of trust and breach of standards of professional conduct expected of AccXel.

These rules are strictly enforced. Any member of staff who enters such relationships will be subject to the company's disciplinary procedure; this may constitute gross misconduct, which could lead to summary dismissal and referral to the Independent Safeguarding Authority. Furthermore, in suspected cases of abuse of a position of trust, the company may report those concerned to the Police.

Personal relationships between employees and learners over 18 years of age must be disclosed to the company via the employee's line manager. This requirement equally applies to relationships that existed prior to employment or enrolment and to relationships that develop at any time afterwards. The company will put in place appropriate arrangements to ensure that the learner's learning and assessment is free from bias. The company will also advise the member of staff and the learner that their relationship should be conducted entirely out of work. 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 company's disciplinary policy.

Please refer to the Safeguarding Young People and Vulnerable Young Adults policy for more details.

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 or their manager. This applies equally to relationships that existed prior to employment and to relationships that develop during employment. Such disclosures must be treated with respect, dignity and in confidence, however, it may be necessary for the line manager to discuss this with their line manager but this will be strictly on a 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 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 provider:

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 confidence.

16. Damage to property:

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

17. Theft:

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

18. Statements to the press or other media (including social media):

Only a member of SMT is authorised to give any statement to reporters from the newspapers, radio, television etc.

19. Guidance notes:

No code of conduct can hope to spell out the appropriate behaviour for every situation, nor should it seek to do so. The company relies on each member of staff to make a judgement of what is right and good practice in any particular situation.

If you are unsure determining what action is appropriate in any given situation it is recommended that you seek clarification from your line manager.

An individual who is not satisfied with an outcome arising from a decision reached in relation to their employment has the right to appeal in line with the grievance procedure.

Please see the staff handbook for further details.

20. Monitoring the Management of Code of Conduct : Signed Acceptance:

During induction all employees must be made aware of the Code of Conduct and need to sign to confirm their understanding and acceptance of the standards set out within it. Signed copies are kept in staff HR files.

Annual training on the staff Code of Conduct takes place, and staff are required to sign to confirm their on-going understanding and acceptance of the standards. Signed copies are kept in staff HR files.

Sign:

A handwritten signature in blue ink, appearing to read 'N. J. D. D.', is written over a faint circular stamp.

Date: 13/12/2021