

NCG Code of Conduct Policy

POLICY / PROCEDURE TITLE		DATE OF APPROVAL
NCG Code of Conduct		March 2024
APPROVED BY	VERSION NO.	VALID UNTIL
Corporation Board	3	March 2027

OWNER	Director People and Development		
GROUP EXECUTIVE LEAD	Executive Principal (People & Culture)		
DOCUMENT TYPE	Policy <input checked="" type="checkbox"/>	Group Procedure <input type="checkbox"/>	Local Procedure <input type="checkbox"/>
PURPOSE	The purpose of this policy is to set out to colleagues the Groups expectations of how they should conduct themselves in the workplace.		
APPLICABLE TO	All NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees/students, volunteers and/or any other parties who have a business relationship with NCG.		
EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	(If EA not applicable, please explain)		
KEY THINGS TO KNOW ABOUT THIS POLICY	<ol style="list-style-type: none"> 1. The policy outlines the general standards and responsibilities for staff conduct. 2. The policy highlights use of social media both in and outside of the workplace 3. The policy also covers professional relationship, professional boundaries and general guidance for how staff should behave at work 		
EXPECTED OUTCOME	Readers are expected to understand the Code of Conduct, know their responsibilities in relation to the policy and comply with the terms of the policy.		

MISCELLANEOUS	
LINKED DOCUMENTS	<ul style="list-style-type: none"> • 'NCG Disciplinary Policy, NCG Grievance Policy, NCG Probation Policy, NCG Performance Management Policy, NCG Probation policy, NCG Sickness Absence Policy • NCG Alcohol and substance misuse Policy, NCG Smoke Free Environment Policy, IT Acceptable Use Policy, NCG Data Policy • NCG Whistleblowing and Disclosure Policy • NCG Safeguarding Policy

KEYWORDS

- Code of conduct, standards, professional boundaries

Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	No	Explanatory Note if required
EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The answer to this must be YES
EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Disability / Difficulty	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Gender Reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Marriage and Civil Partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Religion or Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA3 - Does the proposed policy/processes contain any language/terms/references/ phrasing that could cause offence to any specific groups of people or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA4 - Does the policy/process discriminate or victimise any groups or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
EIA 6 - How do you know that the above is correct?	There has been a robust consultation process involving colleagues and no significant changes have been made.		

1. SCOPE AND PURPOSE OF POLICY

This policy does not form part of colleague's contract of employment and does not confer any contractual rights. It applies to all NCG colleagues, who are employed either on a permanent or temporary basis. The policy also applies to volunteers and agency workers.

The policy applies whilst travelling for work purposes or attending conferences, social gatherings or any other work-related function such as an after-work event.

2. INTRODUCTION

The reputation and success of NCG is built upon not just what we deliver, but how we deliver it. Colleagues of NCG are all accountable for working with integrity and in an honest, open and respectful way. NCG values describe who we are, what we do and how we do it. We value and empower people by:

- *Being both inclusive and diverse.*
- *Taking ownership whilst working collaboratively.*
- *Trusting and respecting our communities.*
- *Inspiring excellence and curiosity.*

NCG Values are underpinned by the NCG Code of Conduct to support the 'People Pillar' of the NCG Strategy Towards 2030 and our aim of being ambitious and responsible educators and leaders. The Code of Conduct sets out the standards that are expected of all colleagues and expresses the behaviours and ways of working which reinforce NCG values that are crucial to our success.

This policy is intended as an overview and cannot describe every situation that colleagues may face, or cover every law, policy or process that may apply. It sets the expectation that in all cases, colleagues are expected to make judgements that are reasonable, practical and safe. When colleagues are faced with a situation they cannot resolve, they should always ask for guidance from their line manager.

3. GENERAL STANDARDS AND RESPONSIBILITIES

All NCG colleagues are expected to:

- 3.1 Ensure that all aspects of their work are consistent with NCG Values as well as the standards set out in this policy.

- 3.2 Work professionally in line with NCG and College policies and procedures. It is your responsibility to read and familiarise yourself with all policies, procedures and legislation that is applicable to your role.
- 3.3 Uphold our commitment to equality, diversity, inclusion and belonging by being respectful and impartial to all colleagues, learners and stakeholders.
- 3.4 Help maintain NCG as a safe and secure learning and working environment by visibly wearing their NCG and / or College identification badge and lanyard at all times whilst on NCG premises and challenge anyone not wearing an ID / lanyard.
- 3.5 Use NCG funds, facilities, resources and computer systems responsibly and for work purposes only, they should not be used for any personal matters. It is essential that we all take responsibility for our actions and ensure that we act in a way that promotes honesty, consideration, respect and courtesy towards our colleagues and learners.
- 3.6 Take responsibility for our actions and ensure that we act in a way that promotes honesty, consideration, respect and courtesy towards our colleagues and learners.
- 3.7 Behave in a respectful manner towards others, ensuring that colleagues and learners do not feel harassed or bullied in any way. Making other feel comfortable and valued is to utmost importance, as we strive to maintain a healthy and positive communication environment.

4. SPEAKING UP

Where a colleague notices behaviour at work which they feel may be a breach of our Code of Conduct or seems illegal or unethical, they should report it to management in a timely manner. Colleagues also have a duty to report any abuse of systems, processes or policies.

In the first instance, colleagues should speak directly to their line manager. Where the issue concerns the line manager, it should be reported to a more senior manager. Any concerns must be raised confidentially through the appropriate management channels or relevant department, such as health and safety or safeguarding. They should not be discussed with peers to enable them to be addressed appropriately.

It should be noted that any cases raised against colleagues will be recorded on both the ER tracker and on iTrent People and Development System

Whistleblowing and Disclosure Policy

Colleagues should also be aware that there is a Whistleblowing and Disclosure Policy in place which applies to all staff employed by NCG under a Contract of Employment, volunteers, all agency staff and all independent contractors and consultants working within NCG, including subcontractors. In addition, it provides the framework for members of the public to raise concerns relating to NCG. The purpose of this Policy and the associated Procedure is to enable any fraud, misconduct or wrongdoing by staff, officers of NCG and subcontractors to be reported and properly dealt with. The aim of this Policy is to provide safeguards to protect staff delivering or working for NCG who raise genuine concerns about malpractice in connection with the organisation. This protection is available to all who have reasonable belief that disclosure is in the public interest.

Criminal Offences and External Investigations

Colleagues conduct themselves in a manner that upholds ethical standards and legal requirements. This includes refraining from any activities or discussions that may incite unlawful behaviour or harm to others.

Colleagues have a responsibility to inform their line manager and safeguarding team, where they are part of any safeguarding processes involving vulnerable adults or children or if they are under any police investigation.

5. DRESS AND APPEARANCE

The appearance and professionalism of Colleagues has an impact on how employers, learners, parents / carers potential learners and visitors view NCG and its services. NCG expects all Colleagues to maintain personal hygiene and dress in a manner that ensures a professional image is portrayed at all times, whether in the office, classroom, external event or meetings. Clothing worn at work should be clean and suitable for the task in hand and without any form of political or potentially offensive slogans or motifs.

6. SMOKING, VAPING ALCOHOL AND SUBSTANCE MISUSE

Colleagues should attend work in a fit state to carry out their duties and therefore must not be under the influence of alcohol or any other substances (including legal highs) at work.

NCG operates a no-smoking and vaping policy in all of our buildings. Should colleagues wish to smoke they should do so outside the boundaries of NCG premises or, where available, use a designated smoking area.

7. WORKING OUTSIDE OF NCG

In line with the exclusivity of service clause in all contracts of employment, colleagues are required to devote their full attention and abilities to their duties during their working hours and to act in the best interests of NCG at all times.

Where a colleague wishes to undertake any (paid or unpaid) employment or engagement they must seek prior written consent from their Principal / Senior Leader to ensure that this does not interfere with the performance of their duties or conflict with the interests of NCG. This is also applicable for any work which commenced prior to a colleague's employment with NCG.

Where a Senior Post Holder wishes to undertake any work outside of NCG they must have approval from the Appraisal and Remuneration Committee (REMCO).

8. IT ACCEPTABLE USE POLICY AND SOCIAL MEDIA

When colleagues communicate through social media, whether in a professional or personal capacity, they should ensure it does not:

- Bring NCG into disrepute, by: criticising or arguing with learners, colleagues or other stakeholders; making defamatory comments about individuals or other organisations; posting images that are inappropriate or links to inappropriate content.
- Breach confidentiality, by; sharing information owned by NCG; giving away confidential information about a learner, colleague or other stakeholder; discussing NCG's future business plans that have not been communicated to the public.
- Do anything that could be considered discriminatory against, or bullying or harassment of, any individual. This includes, making offensive or derogatory

comments relating to any of the protected characteristics as identified in the Equality Act 2010.

When using social media in a personal capacity, colleagues should be aware that this can still damage NCG's reputation if they could be recognised as being an NCG colleague. Where a colleague chooses to discuss their work on social media (for example, giving opinions on their specialism or the sector in which we operate), they must include the following statement on their profile "The views I express here are mine alone and do not necessarily reflect the views of my employer."

9. PERSONAL RELATIONSHIPS BETWEEN COLLEAGUES

- Where a colleague has a personal relationship with another colleague they should declare this to their line manager so that any conflict of interest risk can be assessed and addressed. Where a relationship is with their line manager, colleagues should inform a more senior manager (e.g. line manager's manager) and notify People and Development Department where a record will be retained on the colleague's file. In addition, the annual declarations of interest form requires colleagues to declare close personal relationships.

A personal relationship includes, partners, spouses, family members and close friends. Any information provided will be retained on the colleague's personal file.

10. PROFESSIONAL BOUNDARIES

Colleagues should demonstrate behaviours that are in line with NCG values and ways of working, towards other colleagues, learners and stakeholders.

Colleagues hold a unique position of influence, authority, trust and power in relation to learners and are expected to demonstrate consistently high standards of ethics and behaviour. Professional boundaries must be established, maintained and respected at all times.

Colleagues should consider the following if they are unsure about whether professional boundaries are being, or have been, breached:

- Would they change their behaviour if another colleague was present?
- How they would feel about explaining their actions?
- Are they sharing information for the learners benefit, or for their benefit?
- Are they dealing with this learner differently from others in similar circumstances?
- Is their language or demeanour different from normal when dealing with this particular learner?

There may be situations in which colleagues will have to make decisions or take action in the best interests and for the welfare of learners. The following guidelines are not exhaustive and, in these circumstances, colleagues should use their own sound judgment, think carefully of the implications and potential consequences of engaging in certain behaviours, and always err on the side of caution.

Colleagues should be aware that, in line with Keeping Children Safe in Education, if a safeguarding concern or allegation about another colleague (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared as a low-level concern and will be recorded on the I Trent People and Development system.

10.1 Language and Communication

Colleagues should act with self-control, tolerance and use appropriate language and behaviour when dealing with each other and learners. All communications with learners should be professional in tone and refrain from engaging in overly personal or social conversations without a valid educational context.

10.2 One to One Situations

It is recognised that there will be occasions when confidential meetings must take place with learners. Colleagues should ensure that another colleague is aware that the meeting is taking place which should be on NCG premises, unless approval from the line manager has been given to hold it elsewhere.

10.3 Educational Visits and Activities

Extra-curricular and learning enhancement activities are encouraged. Colleagues must ensure that all activities are risk assessed in line with the relevant off campus

health and safety procedures and approved in advance by the Head of Service / Curriculum / Departmental Director in line with the Educational Visits Policy.

10.4 Transporting Learners

Colleagues should not transport learners in their own private vehicles or offer lifts to anyone under 18 years outside of their normal working duties. In an emergency situation where a learner is placed at risk, colleagues should always keep a record and report the incident to the Head of Service / Curriculum / Departmental Director.

10.5 Personal Relationships with Learners

Colleagues should not initiate or develop a relationship with a learner that has a personal rather than professional element.

Colleagues should not meet or socialise with learners outside of College-organised events. However, it is recognised that there may be occasions where reasonable social contact may be unavoidable e.g. meeting learners at social venues that are open to the general public such as shops and bars. In such circumstances, colleagues should be mindful at all times of their professional relationship with the learner.

Where a colleague's family member or friend subsequently becomes a learner, in the same area they are working, they should inform their line manager and alternative arrangements will be made where required.

10.6 Intimate Relationships with Learners

Colleagues should not initiate or develop a relationship with a learner that is romantic or sexual in any way, irrespective of the age of those involved. This is regardless of whether the relationship is consensual, non-consensual or condoned by parents or carers. Such relationships have a negative impact on the teaching and learning activity and may carry a serious reputational risk for the Colleges.

Where a colleague is in a relationship with an adult, who subsequently becomes a learner, they should inform their line manager prior to the learner commencing their course.

10.7 Physical Contact with Learners

Colleagues should avoid any unnecessary physical contact with learners. However, there may be some situations that require some physical contact with learners, such as sport, drama and dance. This should take place in a safe and open environment and at all times the learner should be made aware of why the contact is necessary and appropriate for the activity that is being undertaken.

It may also be appropriate to have physical contact with high needs learners, including the following situations:

- Mobility.
- Sighted guidance.
- Familiarisation in classroom environments and around campus.
- Practical activities.
- Personal care.
- First aid / medical assistance.

It is best practice to use a light tap on a learner's forearm if they are profoundly deaf to gain their attention.

10.8 Remote Learning, Mobile and Electronic Communications

Colleagues should set and maintain clear professional boundaries when communicating digitally with learners, in line with the Safeguarding Practice for Online Learning guidance. Colleagues should ensure they:

- Use technology for educational purposes or for the organisation of curricular activities.
- Set clear expectations regarding online learner behaviour in the learning environment.
- Restrict communication to specific days and / or times within usual teaching hours, avoiding weekends.
- Maintain a professional tone and relationship in their communications and refrain from engaging in personal or social conversations without a valid educational context.
- Do not share their own personal mobile phone number with learners and use an NCG mobile phone / device, wherever possible during working hours for any communications with learners.
- Use the NCG email system for all email communication where possible.
- Respond to learners in TEAMS group chats and avoid private messaging where possible.
- Do not send personal photos and audio-video clips to learners, or vice versa.
- Do not accept or request learners as 'friends' on social media or otherwise use social media chat groups and forums to communicate.
- Maintain records of conversations and other online digital activities with learners to ensure transparency.

10.9 Financial Regulations Policy and Accepting Gifts from Learners

Colleagues must ensure that they behave in a way that does not allow allegations of favouritism to be made against them. Colleagues should not accept gifts from learners that could be construed as a bribe or lead the learner to expect preferential treatment.

11. POLICY IMPLEMENTATION

Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up and through the induction process and various training and development workshops with Managers.

12. EQUALITY AND DIVERSITY

NCG is committed to providing equality of opportunity. Further details of our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#). This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups.

13. CONSULTATION

This policy has been reviewed in consultation with HR Business Partners and Executive Principals.

VERSION CONTROL				
Version No.	Documentation Section/Page No.	Description of Change and Rationale	Author/Reviewer	Date Revised
1		New policy incorporating individual College policies into one Group policy, streamlining processes in line with current legislation.	Director of People & Development	Jan-21
2		Scheduled review.	Director of People & Development	Feb-23
3	Page 1	Scheduled review. Moved to new template, approval authority changed to Corporation Board as per Scheme of Delegation. Executive Lead changed to Executive Principal (People & Culture). Review cycle changed to 3 years.	Director of People & Development	Jan-24

	<p>Section 3 (page 3)</p> <p>Section 4 (page 5)</p> <p>Section 5 (page 5)</p>	<p>The following areas were also strengthened to set out clear expectations from colleagues:</p> <ul style="list-style-type: none"> • General Standards and Responsibilities • Criminal Investigations • Dress and Appearance 		
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