



"The Interior Experts"

Code of Conduct Policy

Aims and Objectives

Our Clients are entitled to expect the highest standards of conduct of our employees and sub-contractors. The aim of this Code is to ensure that the rules and standards that Workplace Group expects of its employees are clear.

Breaches of the standards set out in the Code will be dealt with through the Disciplinary and Capability Procedure. Scope The provisions of the Code will apply to all Workplace Group employees, volunteers, agency workers, contractors, casual workers, consultants and anyone else who is providing a service on behalf of Workplace Group in all activities in which they are engaged in the course of their employment, whether or not they take place at their normal place of work.

All Employees

It is the responsibility of all employees to read, understand and work in accordance with the Code of Conduct and to:

- Maintain conduct of the highest standard such that our clients confidence in their integrity is sustained
- To be fair and honest in all activities at work
- Incorporate and promote equality and diversity in all that is done
- Ask for clarification on any aspects of the Code when there is uncertainty

Managers in addition to the above

- Role model the required standards of behaviour
- Reinforce the required standards of behaviour through appropriate communications with their teams
- Explain the provisions of the Code to promote understanding
- Coach, support and provide feedback to employees on their performance in relation to the required standards of conduct
- Take appropriate action at the earliest opportunity to deal with noncompliance with the standards of the Code

1. The Employee Code of Conduct

Our clients expect conduct of the highest standards from Workplace Group employees and their confidence would be shaken if the least suspicion arose that any employee might be influenced by improper motives.

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2. Corruption

Employees who have company funds entrusted to them must use them responsibly and lawfully. It is a serious criminal offence for employees to receive or give any gift, loan, fee, reward or advantage for acting or failing to act or for showing favour or disfavour to any person in their official capacity.

3. Private Purchasing

Employees must not use Workplace Groups purchasing systems to purchase items for private use or to secure personal advantage. Employees are not entitled to receive any discount or advantage as a result of their employment with Workplace Group unless this is expressly permitted by Management.

4. Equality

Employees must ensure that they treat colleagues, service users, members of the public and clients and their staff fairly, impartially and with dignity and respect. Language and behaviour in the workplace must be conducive to productive and harmonious relationships.

5. Political Neutrality

Some employees may be required to provide information and advice to clients working in sensitive areas in both the public and private sector. In so doing, they must ensure that they remain politically neutral. In discharging their duties employees must follow every lawful policy of Workplace Group and must not allow their own personal views or political opinions to interfere with their work.

6. Confidential Information

Employees will often receive written, oral and computerised information which is of a confidential nature. Employees must be aware which information in Workplaces possession is classed as confidential and act accordingly.

Information which is classed as confidential must not be disclosed except where there is a legitimate reason to do and not otherwise unless specific approval has been given by an authorised manager. If there is doubt about whether information can be disclosed, employees must consult with management. Deliberate disclosure of confidential information may be considered gross misconduct and may result in dismissal under the companies Disciplinary and Capability procedure. It may also be a criminal offence and lead to criminal proceedings during and potentially after the employee's employment has ended.

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7. Personal Information

Employees must not provide information held by Workplace Group about its Clients, members of the staff or personal information concerning other employees without their consent.

Employees must maintain the confidentiality of all personal information about service users, employees, and others that they have access to in the course of their employment. Deliberate disclosure of personal information may be considered gross misconduct and may result in dismissal under the companies Disciplinary and Capability procedure. It may also be a criminal offence and lead to criminal proceedings during and potentially after the employee's employment has ended.

8. Record Keeping

Employees are responsible for making accurate and relevant records of their dealings with service users and others, and for keeping them so that they can be accessed by themselves and by colleagues if this is appropriate or necessary. All documents and other information in the possession of employees during the course of their employment remain the property of Workplace Group.

Employees are responsible for the security, retention and disposal of all information which they hold and this must be supplied to management on request. If removed from the companies premises, employees must ensure that all confidential and personal information is kept secure at all times and is returned to management for retention and disposal. In order to prevent a continuing liability, on leaving employment with the Workplace Group employees must return all confidential and personal information to their manager.

9. Health and Safety

The Health & Safety at Work Act 1974 places a duty on employees, whilst they are at work, to take reasonable care for the health and safety of themselves and others. Consequently employees are legally bound to comply with all safety rules and instructions set by Workplace Group. The Corporate Manslaughter and Corporate Homicide Act 2007 has created new responsibilities for senior managers to ensure that there are safe working practices and safe premises.

10. Private Trading

Employees are not permitted to carry out private trading in relation to goods, services or any form of intellectual property (including the posting and distribution of private trading literature) on the Companies premises nor may they do so elsewhere whilst on company business.

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11. Other employment

Employees must not allow their private interests to come into conflict with their work. Employees must devote their whole time service to the work of the Company and may not engage in any other business.

This does not preclude employees from undertaking additional work outside their working hours providing that it does not impact on, distract them from or conflict with their work for workplace group and is subject at all times to written permission being granted. All employees who undertake additional work (either paid or voluntary) must notify their line manager in order to ensure compliance with the Working Time Regulations 1998.

12. Information security - Disclosure of Information.

Employees must positively prevent information misuse and ensure the accuracy of information by:

- Protecting information against unauthorised access
- Assuring the confidentiality of stored information
- Maintaining the integrity of information
- Meeting all current regulatory, legislative and Policy requirements in relation to Information Governance
- Producing, maintaining and testing business continuity plans or facilitating such actions where not their direct responsibility but requested to assist
- Providing and making available relevant information and security training for other employees or assisting with such actions where not their direct responsibility but requested to assist
- Preventing improper use of office equipment
- Limiting the use of electronic mail and internet to those uses permitted by the Companies related policies and procedures.

13. Alcohol, drugs and other substance misuse

Workplace Group takes the health and well-being of employees seriously and wishes to minimise problems at work arising from the effects of alcohol and drugs (whether prescribed or illegal). Employees are encouraged to make themselves familiar with the companies Alcohol and Drugs Policy.

Employees are encouraged to seek appropriate advice in relation to alcohol, drugs and other substance misuse and should contact their local GP in this respect. Where the behaviour or performance of employees falls below expected standards and presents a risk to colleagues, services users, members of the public or others due to alcohol, drugs or other substance misuse, this will be

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addressed under the Disciplinary and Capability Procedure or through such other measures as are appropriate to the circumstances.

Employees have a duty to report any problems associated with their ability to drive, use equipment or perform other work related tasks and must not drive or use such equipment whilst their judgment and/or physical ability may be impaired by the use of alcohol, drugs, medicines or fatigue.

13. Fidelity – commitment and loyalty to the Company

In addition to their express terms of employment, employees have common law duties implied into their contracts of employment. These duties require the employee to obey lawful and reasonable instructions, serve the employer personally and faithfully, exercise reasonable care and skill in carrying out their work, abide by the law as established by Parliament and the Courts and not to disclose confidential information after the employment ends. Breaches of these terms could, if proven, lead to disciplinary or legal action being taken against the employee.

14. Conduct and performance

Standards of conduct and performance are determined by senior management. The Disciplinary and Capability Procedure lists the circumstances which are likely to be regarded as gross misconduct. The examples given, which are neither exclusive nor exhaustive, are as follows:

- Theft, fraud, deliberate falsification of records
- Damage to company property
- Being under the influence of alcohol or illegal drugs at work
- Serious negligence
- serious insubordination or refusal to undertake a management instruction
- Misuse of the Companies information particularly deliberate disclosure of confidential or personal information
- Misuse of the Companies facilities including unauthorised use of computer, communications or information services systems
- Conduct which is likely to discredit or be prejudicial to the interests of the Company
- Serious breaches of Health and Safety procedures
- Serious bullying or harassment of any individual
- Unlawful discrimination or harassment on the basis of age, disability, ethnic or national origin, race, gender reassignment, marriage/civil partnership, pregnancy/maternity, religious beliefs, sex or sexual orientation
- Serious breach of confidence (subject to the Public Interest Disclosure Act 1998)
- Hate crimes/incidents
- Physical violence/Domestic Abuse/Sexual Violence
- Acceptance of bribes or any other corrupt or dishonest practice

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15. Personal Use of Social Media by Employees

Employees must not assume that their comments on social media will remain private. Employees must ensure that, in their use of social media, they do not make comments about other employees, or clients that are or could be perceived to be derogatory, abusive, damaging to the individual's or the Companies reputation or amount to harassment, even where such comments are made outside working hours. They should be mindful that such comments could give rise to legal action.

Employees must ensure that no information is made available that could provide a person with unauthorised access to the Companies confidential information and they must refrain from recording any confidential information regarding the Company on any social networking website.

The Company will take action to prevent misuse of social networking sites as the Company as employer may be vicariously liable for the acts of an employee in certain circumstances. The Council will consider what action to take to address any malicious, untrue or otherwise inappropriate allegations which may circulate on social media sites.

16. Personal appearance

Workplace Group expects employees to observe a standard of personal appearance which is appropriate to the nature of the work undertaken, follows operational requirements and which portrays a professional approach which the client will have confidence in. Employees are expected to observe a high standard of cleanliness and personal hygiene.

17. Use of Company property and facilities

Assets and facilities, including stationery, tools, personal computers, laptops, machinery, photocopiers, vehicles, offices, and car park must only be used for official Company business and not for personal use unless permission for their private use is obtained from management.

Use of telephones, either desk or mobile phones must be used in accordance with the Telephone Policy. This restriction also applies to computers, software and data, which must not be used for private purposes or removed from the premises, without the express or prior consent of the management or where permitted in accordance with the Companies related policies or procedures.

The overriding consideration must be that of common sense, so that the situation can never arise whereby suspicion is aroused that an individual has taken advantage of their position as an employee of the Company for personal benefit. All Company resources must be used with care.

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18. Notification of Criminal Investigations and other required disclosures

The Employee Code of Conduct places a general obligation on all employees to disclose information which is relevant to their capability, capacity and suitability to carry out the duties and responsibilities for which they are employed. This general obligation applies irrespective of the role undertaken by the employee and is not limited to information which relates to a conviction, caution, reprimand or warning. For employees undertaking roles for which a criminal record disclosure is required there is a specific obligation on them to disclose any convictions, cautions, reprimands or warnings that they receive in the course of or which are relevant to their employment.

In all cases a failure to disclose relevant information or the deliberate withholding of such information is likely to amount to a breach of trust and confidence and has the potential to lead to the termination of employment. All such instances will be subject to an appropriate investigation during which the Company may wish to instigate a criminal record disclosure check to assist the investigation process.

For the avoidance of doubt an employee must immediately inform management in writing, if during their employment with Workplace Group they are:

- Advised that they are under investigation for a criminal act (including road traffic offences)
- Arrested in connection with a criminal act
- Notified that criminal charges are being considered against them
- In receipt of a summons to appear before a Court of Law for an alleged offence
- Found guilty and convicted of any offence
- Receive a police caution
- Are involved in any other matter which it would be reasonable to think would impact upon their role and or professional standing
- Employees who are required to drive as part of their duties must also declare any penalties received in connection with motoring offences.

Failure to disclose this information may be treated as a disciplinary offence.

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19. Breaches and non-compliance

Any instance of a breach of this policy which comes to the Companies attention will be investigated and appropriate action taken. This may include action under the Companies disciplinary procedures. Evaluation and review This Code will be subject to regular review and will also be reviewed in the following circumstances:

- Where new legislation is published or existing legislation is updated
- Where new guidance is published or existing guidance is updated
- Research, monitoring or auditing suggests that a review may be required.

For the avoidance of doubt the Employee Code of Conduct does not form part of your contract of employment.

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