



Code of Conduct policy for NCS Trust People

Responsible Manager	Cecilia Amis, Director of People
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Version Control

NCS Trust is committed to the continuous improvement of its service offerings and underpinning policies and procedures. It will review the functionality of this policy and related procedures on an annual basis unless an incident warrants it being reviewed sooner or if there is new legislation or guidance that must be taken into account.

Version	Date	Author and job title	Date of approval and by whom	Next Review due and by whom	Comments (changes applied)
1.0	May 2020	Lara Olufon, People Business Partner	Director of People and, Audit and Risk Committee May 2020	May 2021	Creation of policy for approval. Supersedes Conduct, Behaviour and Expectations section of the Employee Handbook
1.1	Aug 2020	Lara Olufon, People Business Partner	Director of People	May 2021	Reference to "The Seven Principles of Public Life" added.
1.2	May 2021	Claire Bamford Rock, People Operations Manager	Head of People	May 2022	Links to other policies updated

1. Introduction

NCS is a youth programme that runs across England, funded by the Government to ensure that everyone has an opportunity to benefit. Our mission is to inspire generations of citizens through a shared experience that develops character and bridges social divides.

Our programme is managed and supported by NCS Trust, our central team who are constantly working to make sure we deliver the most impactful experience we can to as many young people as possible.

Responsible behaviour is fundamental to how we conduct ourselves. It is not just what we do, it is how we do it that is vitally important to both the reputation and success of the Trust.

As NCS Trust People, we are each accountable for doing business – including working with our customers, partners and each other – with integrity and in an honest, open and respectful way.

In practical terms, our Code gives general guidance on situations that might happen in our day-to-day activities on behalf of the Company. While it cannot describe every situation that we may face, or cover every law, policy or process that may apply, it tells us where we can get more detailed information on any of the topics covered and who we can ask for help with resolving concerns.

As a general rule, we are each responsible for understanding and complying with the laws, regulations or policies that relate to our business activities. When we are faced with a situation we cannot resolve, we should ask for guidance.

Our Code of Conduct lays out the standards that are expected of each of us, to support us in doing the right thing. It expresses the behaviours and ways of working which reinforce our Company values – Trustworthy, Results Driven, Inclusive, Bold and Empowering (TRIBE). Together, they describe who we are, what we do, how we want to behave and how we would like others to see us.

We are guided by our values:

- **T**rustworthy: We are responsible, accountable and act with integrity
- **R**esults Driven: We do what it takes to serve the young people of our country
- **I**nclusive: We work together as one team and champion authenticity and individuality
- **B**old: We are innovative, dynamic and think big
- **E**mpowering: We give people the tools, opportunities and respect to step up and deliver

Our values underpin everything we say and do, so the purpose of our Code of

Conduct is to support and clarify how those values apply to the way we operate. It also strengthens the principles of public life laid down by Lord Nolan of selflessness, integrity, objectivity, accountability, openness, honesty and leadership that are expected from everyone who works in a Government-funded role. Our people are expected to observe the Seven Principles of Public Life set out at Appendix A.

These are the behaviours expected of us as employees or contractors of NCS Trust when dealing with colleagues, partners, suppliers and customers.

2. Scope

The Code applies to all employees of NCS Trust including employees on fixed term contracts. It also applies to contractors who work with NCS Trust in a self-employed capacity (they are included in the term "People" for ease of reference throughout, but this is not indicative of their employment status). The Code does not cover employees of our partner organisations, who will be covered by the standards set by their employer.

The Code works together with any other obligations you may have if you're a member of a professional body.

3. Roles and responsibilities

3.1 People

Everyone is expected to have read and be familiar with our Code of Conduct.

3.2 Senior Leadership team, Directors, Heads of and line managers

If you're a manager, you have your own responsibilities under the Code:

- ensuring your direct reports have read and understand the Code
- giving permissions as set out in the Code where appropriate
- calling out behaviours that are counter to the aims of the Code and raising any breaches of the Code with the People Team.

3.3 People Team

The responsibilities of the People Team include ensuring that:

- the Code is kept up to date
- the Code is made available to all new employees and contractors
- managers are advised on how to deal with breaches of the Code.

3.4 Chief Executive Officer

The Chief Executive has overall responsibility for the operation of our Code.

4. Standards of work

The Company expects us all to take personal responsibility for doing the right thing, including:

Awareness and understanding:

- familiarising yourself with this Code and knowing where to go for further information and support; and
- understanding the Company's policies and your responsibilities under them, including any specific responsibilities you hold in connection with your role.

Responsible behaviour:

- complying with all applicable laws and regulations
- conducting yourself in accordance with the highest standards of integrity and ethics at all times
- complying with all applicable Company policies, which you will find in the Employee Handbook
- seeking guidance if you are unsure of what to do or have seen or heard something that does not feel right
- speaking up about any issues or concerns or anything that you have identified as being a potential problem
- supporting your colleagues in doing the right thing
- never retaliating against colleagues who speak up with an issue or concern – this can lead to disciplinary action, which could lead to your dismissal.

5. Inclusive workplace behaviour

We are committed to achieving a positive work environment characterised by professional, courteous and respectful conduct – an atmosphere marked by esteem for the worth of people, where every colleague and stakeholder is treated fairly and where professional views and opinions can be discussed openly and courteously.

To create a constructive and productive workplace, we must listen to others and value their input – even when their views differ from our own. Proactively seeking alternative views helps create an environment in which others feel they can speak up.

You are responsible for your own professional behaviour and, to ensure that you are able to deliver the highest standards possible, you must:

- carry out your role and responsibilities in an efficient, diligent and professional manner
- avoid any behaviour that might impair your effectiveness or damage either your own reputation or that of NCS
- treat each other with courtesy, dignity and respect and ensure your behaviour and language could not reasonably be perceived to be abusive, oppressive, harassing, bullying, victimising or offensive.

We do not tolerate harassment through any means or of any kind, including sexual, verbal, non-verbal and physical. We each have a personal responsibility to make sure that neither we nor anyone else behaves this way.

Allegations of unlawful discrimination, bullying, harassment or victimisation by an employee towards another employee, group of employees or any individual you are in contact with through the nature of your role will be thoroughly investigated and, if proven, may result in disciplinary action.

It is unlawful to victimise someone because he or she has alleged discrimination or supported someone to make a complaint or given evidence in relation to a complaint.

Employees who victimise another employee for any of these reasons will be subject to disciplinary action.

6. The information we work with

While working with us, you may have access to and be entrusted with large quantities of information. This may include, among other things, details of our affairs, business, financing, dealings, transactions, contractors, suppliers, customers, partners and employees. Some of this information will be sensitive and confidential.

Any data you work with in your role should be handled in line with relevant legislation and our [Data Protection Policy](#).

You should not share sensitive or confidential information inappropriately and this may include not sharing it with colleagues. If you are in any doubt over who a document or piece of information can be shared with, you should speak with your Line Manager.

It is also crucial that we do not share such information with anyone who doesn't work for NCS Trust without the right permission. This extends to:

- sharing information that you have access to while working with us

- sharing information about NCS Trust, its employees or any members of the public who we work with
- making false or misleading statements, either orally or in writing, about official business
- speaking to the media or giving interviews about information relating to the Trust unless specifically asked to do so by our PR team.

Please note that it may be appropriate to share information if you have concerns about malpractice happening at work. It is important that this information is shared through the proper channels, so that sensitive confidential information or personal data can be protected, and so that we can take action immediately. For more information on how to deal with this type of situation, please read our [Whistleblowing policy](#).

We expect employees to continue to uphold high professional standards and not share confidential information after leaving NCS Trust. You must ensure that you adhere to any ongoing commitments detailed in your contract, including those around confidentiality.

7. Health, Safety and Security

The health, safety and security of our employees, visitors and young people is paramount and all employees have a role in ensuring our premises remain safe. Employees should familiarise themselves with our [Health, Safety and Security](#) policy and should report any health and safety concerns through the channels defined in this policy.

8. Outside interests and conflicts of interest

We should all be accountable and committed to the work each of us do while we're at work which is why we ask that you don't work for any other organisation or provide services to any person or organisation other than NCS Trust during your contracted hours. Please refer to the Business Interests section of our [Employee Handbook](#) for more information.

In order that we are operating in a transparent and unbiased way, you must comply with our conflict of interest policy and also declare any potential conflicts of interest through our [Conflicts of Interest](#) process, even if these other interests are pursued outside of your NCS working time.

9. Friends, family and personal relationships

Sometimes a relationship may present or give the appearance of a conflict of interest, for instance if a manager forms a personal relationship with a direct

report, or if a family member is applying for a role that you are on the interview panel for.

We must always be seen to be above reproach. Even an appearance of conflict can seriously damage our reputation and our relationship with our People. People feeling that they are treated fairly and in an unbiased way is important for everybody's happiness and fulfilment at work.

Therefore if a relationship exists or develops between you and a colleague or an applicant for a role at NCS Trust that could present a conflict, or that could appear, when viewed by a third party, to present a conflict, you must declare it through our [Conflicts of Interest](#) process as soon as possible. This will allow you and your Line Manager (or other appropriate manager if the conflict relates to your Line Manager) to agree the best way to manage and mitigate the conflict in order that your work and decision making is not affected, and ensure that any appearance of conflict is avoided. This also applies to relationships with a potential or current client, contractor or supplier, where it is vital that we are aware of potential conflicts in order that adjustments can be made to your working relationship as needed.

You should err on the side of caution. If you are in any doubt about whether you should report a relationship, please reach out to your Line Manager or to the People Team for advice.

If you are in a romantic relationship with someone you work with, please respect your colleagues by not having conversations or interactions at work that might make others uncomfortable.

10. Gifts, hospitality and bribery

There may be times when third parties such as existing or potential clients, conference delegates or visitors offer you goods or services in a professional capacity. We expect our employees to uphold the highest standards of integrity and follow our [Gifts and Hospitality](#) policy at all times.

We're an accountable Royal Charter body, which means we're committed to upholding the highest ethical and legal standards and have a zero tolerance towards bribery and corruption.

Everyone, including others acting on our behalf, needs to act in accordance with the Bribery Act 2010. This means that we're all unable to offer, promise, give or accept a bribe either from within work or from or to someone outside of work.

If you have any concerns, even if it's just a suspicion, please report them immediately using our [Whistleblowing policy](#).

11. Working with partners

As employees, we're all ambassadors for NCS Trust so it's important that we maintain mutual respect and good working relationships with one another in order to engage, unite and empower young people. When dealing with partners, remember our values and always communicate in a human and professional way.

12. Social media

As a public body, it is important that our employees do not share politically sensitive opinions or information in the public domain in a way that could be attributed or linked to NCS Trust, or otherwise post anything on social media that could damage the reputation of the Trust. Please refer to our [Social Media Guidelines](#) for information on how this applies to your social media accounts.

13. Safeguarding

The safeguarding of the young people we work with is of critical importance to us and any behaviour that may be deemed inappropriate in relation to a young person will be treated with the utmost seriousness, resulting in potential disciplinary action, which could lead to dismissal.

NCS Trust People must adhere to our [Safeguarding Policy](#) and should report any concerns in relation to the safeguarding of young people through the channels outlined in this policy.

14. Criminal offences

You must inform your line manager in writing if you are under investigation for a criminal act (including road traffic offences) or have been arrested in connection with a criminal action. You must also inform your manager in writing if you have been found guilty and convicted of any offence or received a police caution. Failure to disclose this information may be treated as a disciplinary offence.

Furthermore, if an employee is charged with or convicted of a criminal offence outside employment that may have an impact on their work, NCS Trust reserves the right to investigate the matter independently to ascertain whether any measures need to be taken in connection with the individual's employment. If there is a finding that the individual's conduct outside employment has an impact on their role (reputational or otherwise), we may need to take disciplinary action (up to and including dismissal).

15. Alcohol, drugs and smoking

We are a youth-focused organisation and we welcome young people to our premises regularly, therefore our approach to alcohol, drugs and smoking is reflective of this. Please refer to our [Health, Safety and Security Policy](#) for more detail on our approach to alcohol, drugs and smoking.

If you have an alcohol or drug problem or you want to stop smoking, you should always seek appropriate help, which can be obtained from the NHS website and your GP. We also offer confidential assistance through our [Employee Assistance Programme](#), and we encourage you to make yourself aware of the assistance that the service may be able to offer you.

16. Misconduct

The aim of our Code is to ensure that you're demonstrating our values to an acceptable standard. Any serious, or repeated breaches of it could be viewed as serious or gross misconduct. Please refer to the Disciplinary Policy and Procedure section of our [Employee Handbook](#) for more information on what may be considered misconduct.

17. Whistleblowing

If you become aware of a breach of this Code of Conduct, or if you have concerns about unethical practices, you should report these under the [Whistleblowing Policy](#).

Appendix A

The Seven Principles of Public Life

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable for their decisions and actions and must submit themselves to whatever scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for doing so.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.