



CODE OF CONDUCT AND CORE VALUES

Document reference QT3P2a

1.0 PURPOSE

The standards outlined in this document are representative of the standards of performance and behaviour that are expected of Qualitrain's working community and are not intended as a complete listing of all the company's rules, regulations and standards. Only through the observance of such standards can the company effectively and efficiently serve its external and internal clients and our commitment to being a great place to work.

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 6 core values:

All Core Values
<p>Support: Being responsive to customer, including flexibility and bespoke service:</p> <ol style="list-style-type: none">1. Communicate frequently, offer advice, share ideas, and stress.2. Be responsive to customer: Timely response to queries, bespoke training, flexible and respond to feedback.3. Be positive, help others and share responsibilities to meet deadlines.
<p>Honesty: Being genuine with everyone:</p> <ol style="list-style-type: none">1. Share goals, be clear about responsibilities and agree realistic expectations.2. Be genuine with everyone3. Use reviews to focus on performance and agree what is on-track and what may need to improve.
<p>Integrity: Comply with compliance requirements:</p> <ol style="list-style-type: none">1. Adhere to legislation and company policies and procedures.2. Participate in internal and external audit requests, such as Ofsted and ESFA ones, and respond to outcomes.
<p>Respect: Everyone feels valued. We treat others as we would like to be treated ourselves:</p> <ol style="list-style-type: none">1. Be polite, listen and discuss differing opinions and ideas2. Encourage3. Invest time in involving people in decisions and understanding individual needs and expectations.4. Be willing to raise issues and have difficult conversations.
<p>Loyalty: Commitment to each other, the company and customer:</p> <ol style="list-style-type: none">1. Confidentiality, trust and positive representation of the company.2. Long term relationships with our customers partly built through offering onsite training and flexibility.3. Commitment to help each other so jobs get done, KPI are met and people are not left struggling.4. Commitment to provide staff with opportunities for development to help fulfil potential, career aspirations and possibilities to advance within the company.5. Commitment to building long term relationships with partners and associates.
<p>Inspiration: Striving for team excellence:</p> <ol style="list-style-type: none">1. Motivated to go above and beyond what is required.2. Gaining knowledge from each other and sharing best practice3. Degree of risk-taking, and strategic planning4. Promote success stories



Along with leadership and management using effective honest, open and transparent communication and to:

- Inspire others to do a good job and meet their potential
- Discuss and provide feedback on performance
- Promote a positive culture
- Communicate clear goals and vision
- Recognise, adapt and change rapidly to external forces.

2.0 SCOPE

This Code of Conduct applies to all employees, associates and anyone working within the company on a voluntary or placement basis. It is the responsibility of all members of the company's working community to familiarise themselves with, and adhere to, our rules, policies and procedures, particularly within our Quality Management System (QMS). Failure to comply with the standards of performance and behaviour outlined in this document may result in disciplinary action in accordance with the company's disciplinary procedure. Such disciplinary action may include dismissal depending on the circumstances.

3.0 ATTENDANCE & TIMEKEEPING

Attendance at work is expected to be punctual. Instances of lateness should be explained by an employee to his/her line manager, who will monitor the situation and take action as appropriate in accordance with Qualitrain's disciplinary procedure.

Hours of work are stated in each employee's Contract of Employment. Contracts of Employment and Company Handbook outline 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 the company will address and manage all issues related to employee absence.

4.0 ALCOHOL & SUBSTANCE ABUSE

No one must attend work under the influence of any substance, including alcohol, illegal drugs and/or solvents. Anyone who has been prescribed medication by a healthcare professional must make it known if that medication has, or could, have an adverse effect on their ability to carry out his/her duties. If an employee is found to be in breach of our rules, you may be liable to instant dismissal on the grounds of gross misconduct under the Company's Disciplinary Procedure.

See Drugs and Alcohol policies

5.0 BULLYING AND HARASSMENT

Qualitrain 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 Safeguarding Policy, Harassment Policy and Disciplinary Procedure as appropriate.

See Safeguarding All Policy (QT076), Harassment Policy, and for employees Disciplinary Procedure



6.0 EQUALITY AND DIVERSITY

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

Everyone has an individual 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 Qualitrain and such conduct may result in disciplinary action being taken in accordance with the company's disciplinary procedure.

The company is committed to providing, maintaining a healthy and supportive environment. If you have a disability that may have impact on your work, your health and safety at work or the health & safety of others, you must make the organisation aware of this. This is so that any appropriate measures can be identified that would ensure the health and safety of you, your work colleagues, students, or members of the public while you are at work. For instance, the Mental Health and Stress policy contains support linked to managing stress and other mental health problems.

See Equality, Opportunities and Diversity Policy (QT076P3) and Mental Health and Stress Policy

7.0 HEALTH AND SAFETY

The company 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. All members of Qualitrain's working community 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. No one must 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.

See Health and Safety Policy (QT076P2)

8.0 CONFIDENTIALITY, PARTICULARLY INFORMATION SECURITY MANAGEMENT

All members of Qualitrain's working community have a personal responsibility to protect and maintain the confidentiality of both Qualitrain and client information. The disclosure of confidential information relating to Qualitrain Limited 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.

If anyone is 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 (or company contact).

Employees: Full details of the covenants by which employees are bound in respect of confidentiality are outlined in their contracts of employment, incorporating the requirements stipulated with the Staff Company Handbook including Security of Data Policy.

Associates: Full details of the covenants by which associates are bound in respect of confidentiality are outlined in their service level agreements, incorporating the requirements stipulated with the Associate Policies and Procedures Information Handbook, including Security of Data Policy.

A breach of confidentiality may result in disciplinary action being taken against any employee responsible in accordance with Qualitrain'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 will be dealt with accordingly.

See:

- Security of Data Policy (QT3P4a) and Communications, Email and Internet Policy

9.0 SAFEGUARDING: INCLUDING DISCLOSURE AND BARRING SERVICE (DBS)

Qualitrain Limited is committed to safeguarding all and we expect everyone who works for us to share this commitment. Training and assessment can be with learners under 18 years of age (children), and so require behaviours to indicate suitability to work with children, and if it were alleged that a person's conduct in or out of work may suggest this is not the case, this would be investigated. Considerations can include domestic abuse of partner or behaved in a way that has harmed or may harm a child. Any allegation would be dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation and would be managed through the Safeguarding Policy and Disciplinary Procedure, as appropriate, including reference to *Keeping Children Safe in Education* and the DBS Harm Test.

Qualitrain Limited is committed to adhering to the DBS Code of Practice to determine whether a basic, enhanced, standard or basic check is appropriate for a role. Roles within Qualitrain are assessed to decide the level of disclosure is required. 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 Qualitrain Limited. Failure to co-operate 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 Qualitrain's disciplinary procedure.

See Safer Recruitment and Code of Practice Policy (QT076P1), Safeguarding Policy and Disciplinary Procedure

10.0 STANDARDS OF DRESS

All members of Qualitrain's working community are expected to dress in a way which is appropriate to their role. Some roles necessitate wearing items of protective clothing in the interests of health and safety, and such items should be worn at all times as required.

See Staff Company Handbook: Miscellaneous: Personal Appearance

See Associate Policies and Procedures Information Handbook: Miscellaneous: Personal Appearance

See Health and Safety Statement of Intent Policy (QT076P2)

11.0 DISCLOSURE OF INTEREST

In order to uphold fairness and consistency, and to comply with company regulations (including but not limited to its financial and Ofqual regulations), members of Qualitrain'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 the Qualitrain and/or its business and/or activities which may give rise to conflict / compromise.

See Conflicts of Interest Policy (QT3P2d) which explains staff and associate responsibilities and that all must sign to accept agreement to their responsibilities within it during induction and then every year.

See Staff Induction Work Record (QT3P2WI3WR1) and Conflict of Interest and Change in Circumstances Declaration Form (QT3P2dWR1)



12.0 GIFTS, INCENTIVES AND HOSPITALITY

You 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 (or company contact) if they are offered any substantial gifts or if they require further clarification:

- Neither you, nor any member of your immediate family will accept gifts of any kind from a competitor.
- All gifts offered or sent to you by suppliers or prospective suppliers or customers of the Company must be declared.
- Invitations to functions/events offered by supplier or prospective suppliers may only be accepted with prior approval.

13.0 BRIBERY AND FRAUD

13.1 Bribery and Fraud Overview:

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.

Qualitrain Limited values its reputation for ethical behaviour. Qualitrain has zero tolerance to bribery and corruption. Qualitrain's reputation within the community it serves, and other stakeholders is underpinned by ethical behaviour, good financial management and honesty. Any bribery or fraud breach will contribute to a serious disciplinary offence which may lead to dismissal and may become a criminal matter for the individual.

Its aim, therefore, is to limit the company's exposure to bribery and fraud by:

- Setting out clear anti-bribery and anti-fraud procedures within this policy
- Encouraging all to be vigilant and to report any suspicions of bribery or fraud, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and fraud, and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and clear action against any individual (s) involved in bribery or fraud.

Individuals should discuss with their line manager (or company contact) 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 CEO.

13.2 Anti-Bribery Policy and Procedure

Introduction: The Bribery Act 2010 came into force on 1 July 2011 and introduces an offence for organisations of "failing to prevent bribery". Under the Act organisations need to have in place adequate procedures to prevent bribery occurring.

Statement: Qualitrain aims to limit its exposure to bribery by:

- Encouraging staff and associates to be vigilant and to report any suspicious behaviour, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately. Please refer to Whistleblowing Procedure
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individuals involved in bribery
- Embedding an understanding of the anti-bribery policy and procedure amongst all its staff and any "associated persons" (any person performing services for or on behalf of Qualitrain) and external persons/organisation with whom Qualitrain has commercial relations.



Policy and Procedure: Qualitrain Limited prohibits employees and associated persons from offering, giving, soliciting, or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organization wherever they are situated. The bribe might be made in order to:

- Gain any commercial, contractual, or regulating advantage for Qualitrain Limited in a way which is unethical
- Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.
- Employees and associated persons are requested to remain vigilant in preventing, detecting, and reporting bribery.
- Employees and associated persons are expected to report concerns regarding suspected bribery in accordance with Qualitrain's Whistleblowing procedure (QT3P2b).

13.3 Anti-Fraud Policy

Introduction: Fraud Definition: The Fraud Act 2006 provides a framework within which there are three potential areas that an individual may be guilty of fraud if in breach. These are fraud by:

- a) False representation: a person commits a fraud if they intentionally and dishonestly make a false representation.
- b) Failing to disclose information: a person commits a fraud if they dishonestly fail to disclose information.
- c) Abuse of position: a person commits a fraud if they dishonestly abuse their position.

In (a) to (c) above, the individual is deemed to have committed a fraud if they make a false representation, fail to disclose information or abuse their position for the purpose of:

- i. making a gain for themselves or another; or
- ii. causing a loss to another or to expose another to a risk of loss.

Anti-Fraud Policy Statement

Qualitrain Limited conducts its business in a legal and ethical manner. All persons acting on Qualitrain's behalf are responsible for acting honestly and with integrity.

Qualitrain Limited is committed to the prevention of fraud and to the promotion of an anti-fraud culture. We operate a zero-tolerance attitude to fraud and require staff, students and our partners to act honestly and with integrity at all times and to report all reasonable suspicions of fraud without delay.

We will investigate all instances of actual, attempted and suspected fraud committed by staff, students, consultants, suppliers and other third parties and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/ or legal action.

3. Suspicion of fraud or irregularity may be captured through a number of means, including the following:

- a) Individuals reporting suspicions of fraud or irregularity to a director
- b) Individuals using the Whistleblowing Policy
- c) Identification through operational procedures
- d) Discovery through planned audit work.

Responsibilities: The directors are responsible for:

- Protecting and supporting against harassment or victimisation, those who, in good faith, make allegations of suspected irregular activity.
- Carrying out vigorous and prompt investigations if suspicion of an act of fraud arises.
- Instigating appropriate legal and/ or disciplinary action against fraud perpetrators as applicable.

14.0 FINANCIAL REGULATIONS

Qualitrain Limited 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.

15.0 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 and registration under the Sex Offenders Act 1997.

Employees and associates 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 position of trust and breach of standards of professional conduct expected in Qualitrain.

These rules will be 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 an 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 (or company contact for an associate). This requirement equally applies to relationships that existed prior to the 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 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 procedure.

Location: Safeguarding Policy (QT076)

Between Staff

If you perceive that a personal relationship you have may give rise to a professional conflict/compromise you should bring this to the company's 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 with their line manager, but this will be on a strictly need-to-know basis and will be discussed with the employee/ associate 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 someone if it is perceived that there is a conflict of interest 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 in confidence.



16.0 DAMAGE TO PROPERTY

Anyone suspected of, or caught, causing deliberate damage to Qualitrain 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.

See Security Policy

17.0 THEFT

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

See Security Policy

18.0 STATEMENTS TO THE PRESS OR OTHER MEDIA (INCLUDING SOCIAL MEDIA)

Statements to the press or other media on any aspects of the company's business and/or activities must not be made without prior reference to the CEO. The reasons for this will no doubt be appreciated by employees, as often the Senior Management Team is more aware than staff of Qualitrain's opinion on controversial matters and can therefore ensure that an appropriate statement is made.

Staff and associates must avoid making any social media communications that could damage our business interests or reputation, even indirectly.

Any statement made in contravention of these rules may lead to disciplinary action being taken against the employee/s concerned in accordance with the company's disciplinary procedure.

See Social Media Policy

19.0 INSURANCE AND DRIVING

The company's Professional Indemnity and Employers Liability insurance provide cover for employees and associates. Public and Products Liability insurance only covers employees, so associates need to arrange their own cover, and provide a copy of their insurance as stated in Associate Service Level Agreement and Associate Policies and Procedures Information Handbook: Miscellaneous section.

To comply with the company's Driving Policy, a valid driving licence and business car insurance must be held if you use your car for work and the evidence provided.

See Driving Policy

20.0 COMMERCIAL AGREEMENT

With all the changes and variance in the funding world today it makes sense for Qualitrain to issue guidance to clarify our position and to protect everyone. Discussions around funding and negotiations over pricing of any of our services can only be carried out by directors and the Business Development Team. No one else has the authority to commit Qualitrain (or Qualitrain Group Companies) to any commercial agreements of any kind. This process has been put in place to protect Qualitrain, its staff and associates, especially as the ESFA funding world is complex.



21.0 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 its working community 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 or a director.

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

See Grievance Procedure

22.0 Monitoring the Management of Code of Conduct: Acceptance

During induction, all employees and associates must be made aware of the Code of Conduct and Core Values and confirm their understanding and acceptance of the standards set out within it.

See Induction Work Record (QT3P2WI3WR1)

If the Code of Conduct changes significantly, then staff and associate acceptance to the changes needs to be captured, such as through completion of a Code of Conduct Signed Acceptance Form (QT3P2aWR1) or electronically in MyHRToolkit.

Paper or electronic records are kept in kept in HR files.