

CODE AND CONDUCT AND ETHICS POLICY

POLICY FOLDER: HUMAN RESOURCES

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1.0 INTRODUCTION

- 1.1 Outcomes First Group aims to increase the likelihood of positive outcomes by creating an environment for each individual we support to develop both personally and academically, preparing them for their transition to adulthood.
- 1.2 This policy and procedure recognises that the welfare of the child, young person or adult is paramount and all those working with them must set an appropriate good example. You should always ask yourself: ‘am I being a good role model’ and act accordingly.
- 1.3 This document sets out a Code of Conduct and Ethics for all Group employees. It is applicable to all employees as well as all agency staff, contractors or self-employed individuals engaged in a similar capacity as Group employees.

Implementation: It is the responsibility of line managers to ensure that staff members are aware of and understand this policy and any subsequent revisions.

2.0 DEFINITIONS

Word / Term	Descriptor
‘Welfare’	The welfare of the child, young person or adult is paramount and all those working with them must set an appropriate good example. Individuals should always ask themselves “Am I being a good role model”, and act accordingly on this principle.

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‘Ethical Principles’	Individuals must always treat children, young people and adults in our care, fairly and with respect. Language used by individuals should always be appropriate and stated in such a way that the children, young people and adults in our care understand what is being said to them are saying. Individuals must never swear or shout at those we are supporting. Where appropriate individuals should use other forms of communication such as Picture Exchange Communication as set out in individual plans.
Safeguarding Children, Young people and Vulnerable Adults	All staff members contracted by OFG, working with children, young people and their families, or vulnerable adults must take all reasonable measures to ensure that the risks of harm to their welfare is minimised. Additionally, where there are concerns about children or vulnerable adults’ welfare, all those representing the Group must take appropriate actions to address those concerns.

3.0 PURPOSE

- 3.1 It is important to ensure that any management action taken is fair and consistent and in keeping with the Outcomes First Group’s Equality Policy and practices. Therefore, the policy, procedures and processes identified within this document are applied to all staff irrespective of age, ethnicity, gender, marital or civil partnership status, nationality, offending history, race, disability, religion or belief, sexual orientation, social status, trade union membership or working patterns.
- 3.2 This policy cannot provide a complete checklist of what is, or is not, appropriate behaviour. It does highlight however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or take action in the best interest of a child, young person or vulnerable adult which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the pupils in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.

4.0 RESPONSIBILITIES

4.1 Individuals Must:

- 4.1.1 Be familiar with the Group Safeguarding policies.
- 4.1.1 Care well for children, young people and vulnerable adults and deliver on the OFG Pledge.
- 4.1.2 Safeguard children, young people and vulnerable adults from neglect, physical, sexual and emotional abuse.
- 4.1.3 Promote the welfare of children, young people and vulnerable adults and provide a safe environment for them to live and learn.
- 4.1.4 Identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.

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- 4.1.5 Report as soon as possible, and without delay, any concerns regarding child protection to the Designated Safeguarding Lead (DSL) or equivalent.
- 4.1.6 As a minimum all employees must ensure they have read, understood and comply with: The OFG Safeguarding Policy and local procedures; Keeping Children Safe in Education, 2019, in the case of all school employees.
- 4.1.7 All employees must attend, and comply with, any training as required by the Group.

4.2 Line Managers must:

- 4.2.1 Ensure they comply with all statutory guidance, minimum standards and legislation relevant to the service.

5.0 STANDARD OF PRACTICE AND ACCOUNTABILITY

- 5.1 This code of conduct applies to all those working within our services, regardless of status and role.
- 5.2 This document should be read in conjunction with: 'Guidance for safer working practice for those working with children and young people in education settings, 2019', 'Keeping Children Safe in Education (2019)' and any other relevant guidance as instructed.
- 5.3 The welfare of the child, young person or adult is paramount and all those working with them must set an appropriate good example. You should always ask yourself: 'am I being a good role model' and act accordingly.
- 5.4 You must always treat children, young people and adults fairly and with respect. The language you use should always be appropriate and stated in such a way that children, young people and adults understand what you are saying. (You must never swear or shout at children for example). When it's appropriate you should use other forms of communication such as Picture Exchange Communication as set out in individual plans.
- 5.5 You must comply with all OFG policies and procedures and those of local safeguarding partnership arrangements as required.
- 5.6 Actions in off duty hours must not compromise the values, principles and standards of your work with the OFG.
- 5.7 All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.
- 5.8 All employees governed by a professional body must adhere to the relevant standards. Individuals have a duty to recognize and abide by the ethical standards governing particular professions.
- 5.9 Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- 5.10 All employees are expected to conduct themselves in a professional manner whilst at work. This extends to home working, or virtual learning, where employees are expected to ensure

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that their working conditions, surroundings, and dress are appropriate for their professional role.

- 5.11 Staff should work, and be seen to work, in an open and transparent way.
- 5.12 Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident which may give rise to concern.
- 5.13 The Outcomes First Group (the Group) is committed to operating all aspects of its business in accordance with uncompromising ethical standards.
- 5.14 Individuals should always consider whether their actions are warranted, proportionate, safe and applied equitably.

6.0 SAFEGUARDING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS

- 6.1.1 The Group CEO is responsible overall for propriety including conduct and discipline.
 - 6.1.2 Failure to follow the Code of Conduct may result in disciplinary action including dismissal.
 - 6.1.3 Employees should ensure they are familiar with the type of conduct which may be regarded as a breach of this policy, the wider organisation, and other relevant bodies. Examples of behaviours which are likely to be regarded to constitute misconduct are set out in the Group's Disciplinary Procedure Policy. Allegations of misconduct will be managed in accordance with this procedure.
- 6.2 Allegations and or investigations in relation to people with whom you hold a personal relationship**
- 6.2.1 The Group is not bound by legislation in relation to disqualification by association. However, OFG takes its responsibility to safeguard children and young people seriously and expects employees to notify their line manager if somebody with whom they hold a personal relationship (including online, or living with) is under investigation by a statutory agency or is cautioned or convicted of an offence against a child, young person or vulnerable adult. This should also include domestic violence when a child or young person may have been affected or at risk.
 - 6.2.2 The Group will risk assess the information provided to protect employees, children, young people and vulnerable adults.
- 6.3 Power and positions of trust and authority**
- 6.3.1 As a result of their knowledge, position and/or the authority invested in their role, all those working with children, young people or adults are in a position of trust.
 - 6.3.2 The relationship between a person working with children, young people and vulnerable adults is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

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- 6.3.3 The potential for exploitation and harm of vulnerable people means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 6.4 **Appropriate relationships with children, young people and vulnerable adults (and colleagues)**
- 6.4.1 Employees must maintain appropriate professional boundaries at all times.
- 6.4.2 Employees are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. In order to protect services users and themselves, employees should also avoid behaviour that might be misinterpreted by others.
- 6.4.3 Employees must notify their line manager of relationships with each other or individuals connected with children, young people or adults so that a formal assessment of risk can be completed and maintained. This includes relationships with parents of children in Outcomes First Group care for example.
- 6.5 **Allegations Against Members of Staff and Volunteers**
- 6.5.1 All employees have a duty to report to the DSL, or deputy DSL, at the earliest opportunity the conduct of a colleague which may place a child at risk. Where the concerns relate to a senior manager these should be reported to their line manager. For fostering services any allegation should be referred to the registered manager in the first instance and for central services concerns should be reported to the Group Head of Safeguarding or the Group Director of Quality and Compliance in their absence.
- 6.5.2 Any failure to report such concerns in a timely manner may be regarded as a disciplinary matter. Any allegations must be dealt with in line with the Group's managing allegations policy.
- 6.6 **Infatuations or Crushes**
- 6.6.1 All staff need to recognise that it is not uncommon for children, young people or adults to be strongly attracted to a member of staff and/or develop a 'crush' or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question and does not appear to encourage this. They should also be aware that such infatuations may carry a risk of their words or actions being misinterpreted.
- 6.6.2 Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to a DSL or senior manager. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- 6.6.3 The senior manager should give careful thought to those circumstances where the staff member, young person, their parents/carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed. The plan should be held on the child, young person or vulnerable adults' file and a copy stored on the staff members HR file to protect all those concerned.

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6.7 Physical Contact with Service Users

6.7.1 Employees should be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer or any person to whom this action is described.

Staff should:

- i. Never touch a pupil service user in a way which may be considered inappropriate;
- ii. Always be prepared to explain actions and accept that all physical contact be open to scrutiny;
- iii. Always allow/encourage pupils, where able, to undertake self-care tasks independently;
- iv. Ensure the way they offer comfort to a distressed pupil is age appropriate;
- v. Always tell a colleague when and how they offered comfort to a distressed pupil;
- vi. Be aware of children's individual care plans and respond accordingly;
- vii. Consider alternatives, where it is anticipated that a pupil might misinterpret or be uncomfortable with physical contact;
- viii. Always explain to the pupil the reason why contact is necessary and what form that contact will take;
- ix. Report and record situations which may give rise to concern;
- x. Be aware of cultural or religious views about touching and be sensitive to issues of gender;

6.8 Behaviour Management –

Staff should:

- i. Follow the establishment's behaviour management policy;
- ii. Not use force as a form of punishment;
- iii. Always try to defuse situations before they escalate e.g. by distraction;
- iv. Always show empathy towards children, young people and adults particularly following a physical intervention when they may be upset or hurt;
- v. Keep parents or carers informed of any sanctions or behaviour management techniques used;
- vi. Be mindful of and sensitive to factors both inside and outside of the setting which may impact on a pupil's behaviour;
- vii. Behave as a role model;
- viii. Avoid shouting at children other than as a warning in an emergency/safety situation;

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- ix. Refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI);
- x. Be aware of the legislation and potential risks associated with the use of isolation and seclusion;
- xi. Comply with legislation and guidance in relation to human rights and restriction of liberty;

6.9 The use of physical intervention –

Staff should:

- i. Adhere to the services Physical Intervention Policy;
- ii. Always seek to defuse situations and avoid the use of physical intervention wherever possible;
- iii. Where physical intervention is necessary, only use minimum force and for the shortest time needed;

6.10 Sexual Conduct -

Staff should:

- i. Not have any form of sexual contact with a child, young person or adult from the service;
- ii. Avoid any form of touch or comment which is, or may be considered to be, inappropriate;
- iii. Avoid any form of communication with a pupil which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact;
- iv. Not make sexual remarks to or about a pupil;
- v. Not discuss sexual matters with or in the presence of children or young people other than within agreed curriculum content or as part of their recognised job role;
- vi. Not engage in any sexual contact (or any other behaviour which may be open to mis-interpretation) with other employees whilst at work;

6.11 One to One Situations –

Staff should:

- i. Ensure that wherever possible there is visual access and/or an open door in one to one situations;
- ii. Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy;
- iii. Always report any situation where a child, young person or adult becomes distressed or angry;

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- iv. Consider the needs and circumstances of the children, young people and adults involved;

6.12 Home Visits –

Staff should:

- i. Agree the purpose for any home visit with their manager;
- ii. Adhere to agreed risk management strategies;
- iii. Avoid unannounced visits wherever possible (unless this carried out as supervising social worker undertaking their professional role);
- iv. Always make detailed records including times of arrival and departure;
- v. Never leave a person in your care alone;

6.13 Transporting Pupils –

Staff should:

- i. Ensure that the service transport policy is followed;
- ii. Plan and agree arrangements with all parties in advance;
- iii. Respond sensitively and flexibly where any concerns arise;
- iv. Take into account any specific or additional needs of the child or young person;
- v. Have an appropriate licence/permit for the vehicle;
- vi. Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/ or ability to drive;
- vii. Ensure that if they need to be alone with a child or young person this is for the minimum time and always in line with any local policy and /or individual child or young person's plan;
- viii. Be aware that the safety and welfare of the child or young person is their responsibility until this is safely passed over to a parent/carer;
- ix. Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures;
- x. Ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven;
- xi. Ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified;

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6.14 **Personal living accommodation (onsite) -**

Staff should:

- i. Be vigilant in maintaining their privacy, including when living in on-site accommodation;
- ii. Be mindful of the need to avoid placing themselves in vulnerable situations;
- iii. Refuse any request for their accommodation to be used as an additional resource for the school or setting;
- iv. Be mindful of the need to maintain appropriate personal and professional boundaries;
- v. Not ask pupils to undertake jobs or errands for their personal benefit

6.15 **Whistleblowing -**

Staff must:

- i. Follow OFG Whistleblowing Policy, which can be found in the Document section of Cascade.

6.16 **Duty to Disclose**

6.16.1 Employees have a duty to immediately disclose to their line manager and HR prior to the start of their employment, at the start of their employment, or during the course of their employment, any change in their circumstances or any information which may affect or is likely to affect the suitability of the employee to undertake their job role or work with children and young people. This includes:

- i. The employee being subject to any police investigation / enquiry, arrest, ban, change, caution, reprimand, warning, fine or pending prosecution or criminal conviction. This includes any actions committed overseas which would be subject to a police investigation or formal action if such actions had been committed in any part of the United Kingdom
- ii. The employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by the Health Care Professionals Council, Social Work England, Teacher Regulation Authority, General Teaching Council for Scotland, or the Education Workforce Council in Wales (or any equivalent devolved body in the UK)
- iii. The employee being subject to the inclusion on the DBS Children's Barred List and any change in DBS status during employment, or any referral, made to, or any investigation or proceedings being undertaken by the DBS
- iv. The employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by any other regulatory or professional authorities or actions of other agencies relating to child protection and/or safeguarding concerns

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- v. The employee being subject to any orders made in relation to the care of children, the refusal or cancellation of registration relating to childcare, or children’s homes, or being prohibited from private fostering.
- vi. The employee being subject to any ‘live’ disciplinary process, formal sanction or any other relevant information rising from a previous or current secondary employment/voluntary work which may impact on the employee’s suitability to undertake their role or work with children or young people or in a children’s services setting. This includes substantiated safeguarding allegations.

6.16.2 Each case will be considered individually, and a risk assessment undertaken. Each case will be referenced to the circumstances and the nature of the offences and how these relate to the nature of their position.

6.17 Use of Social Media –

In conjunction with the Social Media Policy, Staff Must:

- i. Ensure that their online presence / profile is compatible with their professional role;
- ii. Ensure appropriate privacy settings are applied when using social media sites;
- iii. Refrain from sharing confidential / privileged information, discussing incidents, operational or employment matters or making critical / negative comments about your service, children, young people, parents, carers, the wider organisation or other professionals;
- iv. Do not browse, create, transmit, display, publish or forward any material / images which are illegal, could offend or harass or anything which could bring an employee’s professional role into disrepute;
- v. Do not share / post images of pupils;
- vi. Do not post images of work colleagues without permission;
- vii. Do not access or update social media sites during working time;
- viii. Employees should not make contact with children, young people, adults, parents or carers via social media accounts or have these individuals as social media ‘friends’/‘contacts’;
- ix. Employees must not have ex- pupils or their families as social media ‘friends’;
- x. Employees should seek guidance from their Manager if they are unclear about the conduct or actions expected of them;

6.18 Health and Safety at Work –

In conjunction with the Health and Safety Handbook available on Cascade, Staff Must:

- i. Always required to comply with the Group’s Health and Safety Policy and agreed procedures.

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- ii. All employees must, by law, take reasonable care for their own health and safety and that of others in the workplace. This includes:
- Avoiding risk or injury or danger to yourself or others
 - Using any protective clothing and equipment supplied
 - Complying with hygiene requirements
 - Report, at the earliest opportunity, any hazards, defects, accidents or incidents to their Line Manager, or other designated person
 - Not interfering with, or misusing, anything provided for health, safety or welfare informing your service of any medical condition or medication which has been prescribed which may have an impact on health and safety in the workplace

6.18.1 Managers should also be aware of, and comply with, any additional health and safety obligations associated with their role. Please refer to the Group Health & Safety Policy.

6.19 **Smoking/ Vaping / Drugs / Alcohol**

6.19.1 Smoking is not allowed on any of the OFG property. It is a disciplinary offence to smoke outside designated smoking areas in offices and anywhere on school and residential premises.

6.19.2 Drugs / alcohol must not have brought onto any OFG premises.

6.19.3 Employees must not attend work under the influence of drugs or alcohol under any circumstances.

6.20 **Use of personal mobile phones / devices**

6.20.1 Employees are not permitted to make/receive personal calls/texts, send/receive personal e-mails or access internet for personal use or access social media during work time where children are present.

6.20.2 Employees should ensure that mobile devices are silent at all-times whilst working with children, young people or adults. Personal mobile devices should be locked away during the day.

6.20.3 Employees must never use their personal equipment (mobile phones/cameras/tablets) to take photos or make recording of those in their care.

6.21 **Monitoring of usage of email**

6.21.1 Emails, documents or browsing history on company systems should not be considered to be private and may be monitored and recorded to ensure the safety of children, young people and adults and ensure compliance with this OFG policies.

6.21.2 Any monitoring will be proportionate and will take place in accordance with data protection and privacy legislation.

6.21.3 OFG may address concerns regarding unauthorised, unacceptable or inappropriate use of ICT systems / devices or social media as a disciplinary matter.

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6.22 Dress code

6.22.1 A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs. However, staff should select a manner of dress and appearance appropriate to their professional role and which may be necessarily different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear to dress in a manner which could be viewed as offensive or inappropriate may render themselves vulnerable to criticism or allegation.

6.22.2 At Outcomes First Group we believe that children, young people and adults are influenced by role models around them. All employees form an important part of that modelling process and as professionals it is important that we provide the best example of appropriate clothing for the task in hand.

6.23 Punctuality & Sickness Reporting

6.23.1 You are required to be punctual in observing times of work.

6.23.2 You are required to attend work in accordance with your contract and agreement with your line manager and to attend planning and review meetings at the agreed times.

6.23.3 You must not be absent from work without authorisation.

6.23.4 You must follow the Sickness Absence Reporting Procedure when absent from work due to ill health.

6.24 Appointments

6.24.1 An employee must never be involved in a recruitment process or promotion decision where one of the applicants is a relative, partner or close friend.

6.25 Be accountable (OFG Value)

6.25.1 Employees should be aware of their accountability to the directors of the Group. The Group Directors have responsibilities as an employer.

6.25.2 Employees should conduct themselves with integrity, impartiality and honesty. They should not deceive or knowingly mislead directors, colleagues, clients, purchasers, customers or the public.

6.25.3 Employees should never compromise adherence to such standards in favour of financial or other business objectives.

6.25.4 The Group requires all their employees to observe the highest standards of integrity and honesty and act with due skill, care, diligence and fairness in the conduct of business. This Code is intended to promote honest and ethical conduct and compliance with law and to deter wrongdoing and encourage disclosure of conflicts of interest.

6.25.5 It is the responsibility of management to ensure that the Code Conduct and Ethics are communicated, understood and acted upon. They are required to positively promote them by personal example and are not entitled to permit any exceptions to the required behaviour.

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- 6.25.6 All managers should familiarise themselves with the Code of Conduct and Ethics and must comply with and promote this Code. Failure to act in compliance with the Code will result in appropriate disciplinary action against both the employee committing the breach and others who condone it.
- 6.25.7 The Standards set out in the Code are general and do not address each and every situation that may confront employees. Employees should not engage in unethical activities by seeking loopholes, shortcuts or technicalities. Every action should be judged by considering whether it is legal, fair to all concerned and would withstand the scrutiny of outsiders. In appropriate cases, guidance on the application of the Code to particular situations should be sought from management. In addition, the HR Department is available on a confidential basis as an independent source of advice.
- 6.25.8 It is the responsibility of each employee to report promptly any violations of the Code of Conduct and Ethics of which they become aware. Details of the procedures for raising integrity concerns and relevant contact details are given at the end of this document. We actively encourage employees to raise issues of concern and will ensure that employees, who raise an issue in good faith, will be protected from any adverse impact on their employment.

7.0 STANDARDS OF CONDUCT

7.1 Business Practices

- 7.1.1 We must comply with the laws of all countries in which we operate, with appropriate national industry codes of practice and with the high ethical standards of honesty and integrity
- 7.1.2 Whilst the OFG does not expect its employees to be experts in legal matters, it is the responsibility of all employees to ensure, by taking advice where appropriate, that they are familiar with all relevant laws, regulations, practices and codes of practice, particularly as they relate to their job. Employees should seek advice from the relevant department if they have a question concerning the application of the law
- 7.1.3 Employees should ensure that, within their sphere of business activity, we carry out our contractual obligations in a proper and timely manner and are not in breach of contract.
- 7.1.4 The exchange of gifts with customers and suppliers is a normal and acceptable business practice. Gifts, entertainment and personal favours may only be offered to a third party if modest in value and if they are consistent with customary business practice. No gifts, entertainment or personal favour may be offered in contravention of any applicable law or code of practice
- 7.1.5 No employee should seek or accept a gift, entertainment or personal favour which might reasonably be believed to have any influence on business transactions, specifically not during a tender process. An offer of entertainment should not be accepted unless the offer is within the bounds of acceptable business hospitality (i.e. does not create or could be construed to create an obligation). Gifts which do not meet the above criteria should be reported to management who shall determine how they should be dealt with.
- 7.1.6 Group funds will not be used without CEO consent or Board Approval in payments, direct or indirect, to government officials, people participating in government bodies, employees of

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state organisations or representatives of political parties, or for unlawful or improper purposes.

7.1.7 This policy should be read in conjunction with the OFG's Anti Bribery Policy.

7.2 Working Environment

7.2.1 All employees shall be treated with equal respect and dignity and shall be provided with equality of opportunity to develop themselves and their careers.

7.2.2 We strive to achieve diversity at all levels of the organisation and value the individuality, diversity and creative potential that every employee brings to its business – and supports the continuous development of their skills and abilities.

7.2.3 Judgement about people for the purpose of recruitment, development or promotion shall be made solely on the basis of a person's ability and potential in relation to the needs of the job. Overall success and advancement within the Group shall depend solely on personal ability, behaviour and work performance.

7.2.4 All employees are entitled to a work environment free of verbal, physical and sexual harassment. Staff behaviour should be above reproach or criticism and harassment at work will not be permitted. Management and staff have agreed guidelines for dealing with workplace harassment and these are set out in the companies Equal Opportunities Policy.

7.3 After Leaving Employment

7.3.1 Employees should continue to observe their duty of confidentiality as well as their post termination obligations which continue to be in force after they have left the employment of the Group.

7.4 Relations with the Public

7.4.1 Employees who deal with the affairs of the public should do so sympathetically, efficiently, promptly and without bias or maladministration. Employees should offer the public the highest standards of conduct and service. Employees should carry out their duties in compliance with the principles and standards set out in Company Policies and Procedures and where relevant their professional codes of conduct.

7.5 Political Activity

7.5.1 Any political contributions must be approved by the Group Board.

7.5.2 Approval will not be given to any political contributions which, by their scale or affiliation, might be seen as excessive or inappropriate. The Group's accounting procedures require any political contribution to be reported in the statutory accounts of the statutory entity.

7.5.3 Employees should not take public positions on behalf of the Company without first obtaining approval from the Executive team.

7.6 Conflicts of Interest

7.6.1 Employees must act in the best interests of the Group and must disregard any personal preference or advantage and should avoid conduct which presents an actual or potential conflict of interest.

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7.6.2 Employees should avoid entering into situations in which their personal, family or financial interests may conflict with those of the Group. Where any potential conflict of interest may arise, the employee shall declare that interest in writing to the Group HR Director and seek advice from senior management. Employees should not misuse their position or information acquired in their duties to further their private interests or those of others. Key employees, such as the Directors, managers, and employees working on contracts, should ensure that any possible conflicts of interest are identified at an early stage and that appropriate action is taken to resolve them.

7.6.3 Examples of conflict to be declared and resolved include:

- i. Recruiting a family member including extended family members, relatives and friends in any capacity
- ii. Family member and /or close relative acting as a Foster Carer
- iii. Having an interest, directly or indirectly or through family, in a competitor, supplier or customer of the Group or one of its subsidiaries, or otherwise in an organisation that has or seeks to do business with the Group or one of its Group Companies;
- iv. Acquiring an interest in property (such as real estate, patent rights or securities) where the Company has, or might have, an interest.

These examples do not extend to normal or proper financial investments in publicly quoted companies.

8.0 PROPERTY AND RESOURCES

8.1 Group resources should be kept securely and should only be used for the proper advancement of its business and not for personal gain by employees. Employees should endeavour to ensure the proper, economical, effective and efficient use of resources.

8.2 Individuals should recognise that they owe a duty of care to the shareholders who are its ultimate owners. Commitments and expenditure should only be incurred if they are wholly, exclusively and necessarily for business purposes and in line with company policy. This includes any expenses claimed and purchases made for which reimbursement is sought.

8.3 Resources include not only tangible assets such as materials, equipment and cash, but also intangible assets such as computer systems, trade secrets and confidential information. Employees should observe company guidelines concerning the classifying and handling of documents and electronic data. The storage of personal data in an electronic medium is governed by laws with which relevant employees should familiarise themselves and comply.

8.4 Information generated within the Group including research and development and data, costs, prices, sales, profits, markets, customers, and methods of doing business, is the property of Group and must not, unless legally required, be disclosed outside the Company without proper authority from an Executive Director.

9.0 POLICIES, DELEGATED AUTHORITIES AND RESERVED POWERS

9.1 Employees are expected to make themselves aware of and comply with the letter and spirit of all Group policies and with the reserved powers and delegated authorities established by

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the Board from time to time. Copies of these are available on the Company's HR System, Cascade located under the documents section.

- 9.2 The freedom which individuals have to carry out their jobs must be exercised within both the letter and spirit of policies and procedures, reserved powers and delegated authorities. These are designed to empower people to carry out their responsibilities within a necessary framework of corporate control and legal responsibility but are not so voluminous as to prescribe appropriate action in every circumstance.

10.0 FINANCIAL AND OTHER RECORDS, DISCLOSURES AND COMMUNICATIONS

- 10.1 All OFG Companies and their employees are required to keep proper accounting and other records which give a true and fair view of the financial position, results of operations, transactions, assets and liabilities so as to enable the Company to make full, fair, accurate, timely and understandable disclosures in all reports it is required to publish, file or submit to shareholders and regulators and in all other communications which it publishes.
- 10.2 All accounting and other records will be maintained in a manner that describes and documents accurately the Company's true financial position and results of operations and the true nature of its business transactions, assets and liabilities. Accounting records will be kept in accordance with Group policies, relevant accounting standards and appropriate generally accepted accounting principles.
- 10.3 Employees must ensure that all reports published, filed or submitted to shareholders and regulators and all other communications which are published by the Company are full, fair, accurate, timely and understandable; they must not mislead the reader in any way nor omit anything necessary to make them full, fair and accurate.

11.0 PROCEDURES FOR RAISING INTEGRITY CONCERNS

- 11.1 The integrity of the organisation is diminished whenever these standards are violated. Employees should not use their position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. They should not receive benefits of any kind from a third party which might reasonably be seen to compromise their personal judgement and integrity.

12.0 PERSONAL INTEREST

- 12.1 The integrity of employees must be beyond suspicion. Accordingly, if any employee has to deal in an official capacity with any matter in which he/she has a private interest, however slight and of whatever character, it is the employee's duty to disclose all the facts to his/her manager.
- 12.2 An employee having a direct or indirect financial interest in any item of business of the Group shall disclose the fact to his/her manager and shall not take part in any item of business in which he/she has a financial interest.
- 12.3 The Company offers you a stepwise approach to getting answers to your questions about integrity issues and to raise concerns about what might be a violation:

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12.4 *Locally/within your business:*

- i. Consider contacting your line manager
- ii. Consider contacting another senior manager within your organisation

If route 1 is not appropriate, or an adequate response is not received:

- i. Contact the Group HR Director or Group Director of Quality & Compliance; or,
- ii. Write to:
 - Chairman
 - Outcomes First Group
 - Atria
 - Spa Road
 - Bolton
 - BL1 4AG

13.0 MONITORING AND REVIEW

- 13.1 This Policy will be reviewed annually to ensure that it complies with legislative and regulatory requirements and best practice. It is subject to approval by the board of executives and will be put to the trustees for approval after each review.