Staff Code of Conduct

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This policy has been reviewed in line with the Equality Act 2010 which recognises the following categories of individual as Protected Characteristics: Age, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual orientation and Disability. We will continue to monitor this policy and to ensure that it has equal access and does not discriminate against anyone, especially any person/s listed under any protected characteristic.

PRINCIPLES

1.1. This policy is drawn up in line with The Bedford College Group's (TBCG) Values of:

Valuing Teamwork: We are one team who by working together can achieve great things, respecting the opinion and valuing the contribution each of us makes.

Improving continuously: We challenge ourselves to always do better by trying new things, sharing knowledge, reflecting on best practice and learning from others.

Student centred: At our heart is always doing what is best for our students. We consider students in all of our decision making to create positive outcomes and memorable experiences for every student.

Inclusive: We celebrate differences and diversity, recognising that we can learn from each other.

Open and caring: We care about the wellbeing of our staff, our students, our community and wider society, creating an environment built on trust where we listen, engage and support each other.

Nurturing educational excellence: We promote educational excellence by delivering programmes that challenge our students to achieve their ambitions.

1.2. The purpose of this code of conduct is to provide staff with the expected standards of behaviour in the workplace.

1.3. Safeguarding students is of paramount importance to TBCG, and the code of conduct sets out clear rules as to the professional boundaries all staff MUST abide by whilst working directly with, or being in contact with students. **This applies to ALL students irrespective of age.** Failure to abide by these will lead to potential Gross Misconduct proceedings being instigated against the staff member concerned.

1.4. Any staff member who has a pre-existing relationship (partner, friendship, family member etc.) with a student due to join the college must declare this to the Safeguarding Team through their line manager prior to that student commencing and to the People Team so it can be included on the Relationship Register.

1.5. Any staff member who is a parent or guardian of a student joining, must ensure that they do not blur the boundaries between staff member and primary carer and ensure they do not use their position at work to influence other staff members or deal with any issues regarding the student during working time.

1.6. The Code of Conduct underpins the important principles of mutual trust and confidence between TBCG and their staff and the behaviours (both during working hours and outside these) that may lead to irreparable damage to this relationship.

1.7. Any staff member who experiences **ANY** police involvement including (but not limited to) interviewing, arrest, caution, charge, conviction, finding of guilt etc., **ANY** involvement with any type of court or **ANY** regulatory action or barring **MUST** report it immediately to their line manager, who should forward that report onto the People Team to identify if any action is required. Failure to report any matter, no matter how minor, or failure to co-operate with DBS rechecking, could lead to disciplinary action.

1.8. The policy applies to all employees, associate workers, agency workers and contractors providing work within TBCG.

2. PROFESSIONAL BOUNDARIES

2.1. The Professional Boundaries guidelines reflect TBCG's commitment to safeguarding and exists for the protection of both staff and students and, as set out in 1.3, applies to ALL students irrespective of age. **However, when working with students, under 18 and vulnerable adults it should be noted that a breach of this Code of Conduct could also lead to criminal proceedings.**

2.2. Boundaries

2.2.1. Many students have difficulty with boundaries and may expect staff to help them immediately with their personal problems. This might be because they lack self-confidence or self-esteem, or because they have difficult or stressful relationships with their families or peers. They may have no one else to turn to outside college and may therefore have trouble recognising their own boundaries, and what is appropriate to expect of staff.

2.2.2. Where there is regular contact with students, a professional working relationship should develop, and this development should be positive for both staff and students. It is common in this situation for a student to 'reach out' to people they see on a daily basis (e.g. Inclusion & Development Coordinators, Student facing staff, Lecturer/Teacher) and confide in them, particularly if they lack support outside of the college.

2.2.3. The responsibility is on staff to set the boundaries of their roles, which doesn't include replacing family or Social Services, or being a 'friend'. In this way there is no ambiguity and the student is clear about what support can and cannot be offered.

2.2.4. As outlined in 1.5, where a staff member is also the parent of a student, they should be mindful of their 'primary role' in any given circumstances.

2.2.5. All staff are in a position of authority and status with students and as such must **NEVER** enter into a relationship with **any** student irrespective of age, and to do so would lead to Gross Misconduct disciplinary action being instigated and depending on the student, may also lead to criminal proceedings.

2.3. What are Appropriate Boundaries when Working with Students

2.3.1. Professional boundaries are an essential part of our work as college staff. How we present ourselves, our interaction with others and our general conduct are highly significant when working directly with the students in our classroom or interacting with them around college. Our professional conduct reduces the risk of allegations against staff and keeps students safe from harm.

2.3.2. Safeguarding students, and protecting yourself from the risk of allegation, is a key professional priority. Personal and professional boundary setting should seamlessly flow through all interaction and intervention within the college. Boundaries shape our relationships with students, families, care-givers and professional colleagues.

2.4. Duty of Care

2.4.1. The Education Act 2002 imposes clear duties to provide acceptable levels of care and to protect children and young people from all reasonably foreseeable risk of harm or injury. Duty of Care refers to the responsibility of those staff members employed within a position of trust, to provide students with adequate levels of protection against harm and to safeguard their welfare at all times. What constitutes "reasonable and acceptable care" in any given case will be determined objectively by the court and will depend upon the circumstances of each case. The standard of care expected from schools & colleges is understandably very high.

2.5. Shared and Agreed Boundaries

2.5.1. The teacher-student relationship is not equal. Teachers and all professionals in education are in a unique position of trust, care, responsibility, authority and influence with students. This means that there is always an inherent power imbalance within the teacher-student and staff-student dynamic.

2.6. Information Sharing

2.6.1. Staff must avoid sharing personal information. Your online boundary-setting is equally as important as your college and classroom-based boundaries. Remember that social media is just that – social. Examples staff must avoid that could lead to disciplinary are (This list is illustrative and not exhaustive):

- Discussing personal details of self, other staff or students unless directly relevant to the learning topic and with the individual's consent.
- Exchanging or corresponding of a personal nature via any medium (phone, text, social media, email etc) that is unrelated to the staff member's role. This does not include class birthday cards and the general acknowledgement of other celebrations – warmth and thoughtful modelling remains important.
- Adopting an on-going support or welfare role, beyond the scope of your position, or a role that is the responsibility of another staff member (e.g. a Inclusion & Development Coordinators, Designated Teacher, Designated Safeguarding Lead) or external professional, that occurs without the permission of a senior member of staff or the appropriate lead.
- Photographing, audio recording or filming students via any medium without authorisation from a member of Executive or without parental consent.
- Using personal rather than college equipment for approved activities, unless authorised by the Head of School/Department/senior manager.
- Correspondence or communication (via any medium) to or from students where a violation of professional boundaries is indicated and where the correspondence has not been provided by the Head of School/Department/senior manager.
- Facilitating or permitting access to pornographic or sexually explicit material.
- Failing to intervene in sexual harassment of students.
- Still/moving images or audio recordings of students on personal equipment or kept in personal locations such as car or home that have not been authorised by a member of Executive.
- Uploading or publishing still/moving images or audio recordings of students to any location without parental and Head of School/Department/senior manager consent.
- The sharing of extreme views or content

2.6.2 The Bedford College Group (TBCG) expects staff to use social media responsibly and professionally, aligning all activity with Group values, the staff code of conduct, and the goal of maintaining a strong and positive reputation. It is within the Social Media Policy and Guidelines that:

- Personal social media accounts must clearly separate personal opinions from official College/Group communications and that the personal opinions shared should not be extreme.
- Staff are encouraged to celebrate College or Group successes in line with its values and adhering to this policy and permissions.
- Staff should not post or engage with content that could harm the Group's reputation.
- Misuse of social media will be addressed under relevant HR or disciplinary procedures.
- Legal compliance e.g. data protection, copyright, and safeguarding is mandatory.
- No staff should set up social media accounts affiliated with TBCG and its brands. Prior approval from the Head of Corporate Communications and PR is required before any new accounts are created that are affiliated with the Group, its Colleges or course areas.
- The Bedford College Group monitors and responds to activity that affects its reputation or the safety of its students and staff.
- No staff should respond to negative comments on behalf of the Group unless approved by the Communications Team.

- LinkedIn accounts should be kept up to date with job roles when working at the Group and all staff are expected to update this if they are no longer employed by TBCG or its brands. Failure to do so will result in action being taken. The Communications Team are able to support this by emailing communications@bedford.ac.uk

2.7. Appropriate Language

2.7.1. Staff should develop good strong trusting relationships with the students that they teach, but should always remember they are not "friends" with them. On this basis always be thoughtful about the language that you might be using. Sensitive thought and challenge should be explored in relation to inappropriate language or terms. Examples staff must avoid include (This list is illustrative and not exhaustive):

- Use of inappropriate names, nicknames or terms of endearment.
- Inappropriate conversation or enquiries of a sexual nature.
- Inappropriate comments about a student's appearance, including excessive flattering or personal criticism.
- Disrespectful or discriminatory treatment of, or manner towards, students based on their perceived or actual sexual orientation.
- Humiliation, profanity or vilification.
- Insensitive/unacceptable language or behaviour towards higher needs students
- Suggestive humour, "banter", jokes or innuendo of a sexual nature.
- Obscene or inappropriate gestures and language.
- Names such as buddy, mate, pal, friend and so on which may give confusing messages.
- Any derogatory language in relation to any of the Protected Characteristics within the Equality Act 2010.

2.8. Personal Space

2.8.1. Respect the personal space and privacy of all students. Remember that students can read different interpretations into our actions. It is also very easy for these situations to escalate if we are not sensitively, proactively and dynamically challenging and managing boundaries. The exception to this will always be related to safeguarding and the safe management of risk. Examples staff must avoid include (This list is illustrative and not exhaustive):

- Unwarranted or unwanted touching of a student personally or with objects (e.g. pencil, book, ruler etc).
- Corporal punishment (physical discipline, pushing, shoving, smacking).
- Initiating, permitting or requesting inappropriate or unnecessary physical contact with a student (hugs, kisses, tickling, play fighting) or facilitating situations which unnecessarily result in close physical contact.

2.9. Work and Home

2.9.1. Work and home or the personal and the professional, should be held separately. Remaining "in role" at all times minimises the likelihood of false, or unfounded allegations and ensures that professional codes of conduct are adhered to. Examples staff must avoid include (This list is illustrative and not exhaustive):

- Arranging to meet a student(s) outside of work hours or off college premises (unless on an official trip/excursion)
- Inviting, allowing or encouraging students to attend your home.
- Allowing students access to a staff member's personal internet locations and personal devices (e.g. social networking sites).
- Attending students' homes or their social gatherings.
- Being alone with a student outside of a staff member's responsibilities unless agreed by a senior manager.
- Entering changing rooms or toilets occupied by students when supervision is not required or appropriate.

- Undressing using facilities set aside for students, or in their presence.
- Transporting a student unaccompanied without prior permission.
- One-to-one tutoring, mentoring or coaching of students without the prior agreement of line manager/senior manager.
- Giving personal gifts or special favours. Singling the same students out for special duties or responsibilities. Offering overnight, weekend or holiday care as respite to parents/guardians without the prior knowledge of the line manager/senior manager.

2.10. Managing Behaviour

2.10.1. Staff must challenge anti-discriminatory language/jokes. We are role models to the students across the Group, and it is important that we promote and respect difference. We also have a responsibility to challenge negative ideas, assumptions, behaviour and language whenever it occurs. This is how students will learn new ways of thinking about themselves and others. We must be clear and consistent in demonstrating that banter is not acceptable.

2.10.2. **Non-Verbal Communication & Body Language**Our moods and feelings affect our thinking and most importantly our communication. This is also true of our non-verbal communication; body language, eye contact and facial expressions. This can have a huge impact on our interactions with students and colleagues alike.

2.10.3. We are all human and we may have things going on in our lives at work or at home that will affect our mood, attitude, judgement, emotional presentation and possibly, our demeanour. As professionals, we must learn to separate these issues when we are working directly or dealing with students. Support for staff personal issues can be sought through the line manager, our Employee Assistance Programme (EAP), or the People Team.

2.10.4. Our personal issues are not problems for students to be party to, and they should be protected from unhelpful exposure to our personal or professional challenges or emotional difficulties.

2.11. Communicating with Students

2.11.1. It is important that staff do not leave themselves open to allegations of inappropriate conduct in communicating with students, and also that they maintain their work-life balance by not allowing student communication to encroach on their home life.

Do

- Ensure that communications with students are transparent and open to scrutiny.
- Use only your TBCG email, telephone number or Microsoft Teams to communicate with students.
- Communicate via college email and/or Microsoft Teams.
- Log and report any communication from a student you feel is inappropriate to your line manager immediately.

Do not

- Allow students to access your personal social networking space (e.g. Facebook, Instagram, Snapchat, X etc.) – students may use the internet to search for information about you so you may get requests to add them as ‘friends’. These requests should not be accepted.
- Share any personal information with students.
- Communicate with students via your personal email, home telephone, social media or mobile.
- Use any form of banter, swearing or derogatory language.

2.12. Inappropriate Situations

2.12.1. The below situations clearly involve College staff stepping outside their professional boundaries with a student. Although for the vast majority of professionals this kind of behaviour would be unthinkable, there are many more subtle ways that staff may get into difficulties which may detrimentally affect them or a student. It is not always clear when these situations happen, and it is good practice to check out experiences with peers or to seek advice and clarification from more experienced colleagues or managers. Here are some scenarios that may help staff to think about potential boundary problems in their roles (This list is illustrative and not exhaustive):

- Developing any form of personal relationship in or outside college
- Allowing students to touch or hug when they greet staff
- Lending students money (because they have had their wallet stolen, etc)
- Paying more attention to some students, than others, while working with them
- Socialising with students in general or socialising with some students but not others (e.g. going for a cigarette or coffee with them)
- Allowing a student to be a 'friend' on a social networking site
- Promising a student confidentiality
- Students giving gifts or doing favours for staff
- Students discussing in detail personal problems and asking staff for advice
- Holding 1:1 meetings with students in remote or secluded places.

2.13. Possible Consequences for Staff of Not Maintaining Professional Boundaries

2.13.1. Staff may leave themselves open to allegations and criminal charges of sexual, physical or financial abuse.

2.13.2. Staff may leave themselves vulnerable to being the subject of manipulative or obsessive "stalking" behaviour (the student may believe that a member of staff's actions indicates a personal or inappropriate interest or relationship with them).

2.13.3. Staff may feel overwhelmed by the disturbing emotional content of the problems learners share.

2.13.4. Staff may be subject to the TBCG disciplinary process and be dismissed.

2.13.5. Staff may lose their reputation and employability as not maintaining professional boundaries could be a breach of safeguarding rules.

2.13.6. LADO may require us to make a DBS referral on the individual and/or a referral to the Teacher Regulation Agency.

2.14. Possible Consequences for Students when we do Not Maintain Professional Boundaries

2.14.1. The consequences for student are just as serious and potentially damaging, for example:

- Emotional/psychological damage of being included or excluded for special treatment. This reinforces low self-esteem beliefs that some students are more likable/popular/deserving than others.
- Student is in a dependent position rather than encouraged to develop coping skills and be independent.
- Emotional/psychological damage of receiving mixed or inconsistent messages from trusted, respected, professional role models.
- Ostracising or bullying by friends and classmates due to "special treatment" or exclusion from special treatment.
- Exclusion from College and disruption of their education.

- Criminal charges for assault, abusive behaviour, stalking.

2.15. Boundaries and the Inclusion & Development Coordinators Role

2.15.1. Because of the nature of the role, inclusion & Development Coordinators should be especially cautious about getting too personal or too close to their students. They should:

- Be knowledgeable about TBCG's confidentiality and safeguarding procedures and the legal implications of being in a position of trust
- Know 'whom to call, when' - they are not expected to have all the answers
- Make appropriate referrals for students who are having problems, rather than to try to handle an issue that may require specialised training (e.g. medical issues, safeguarding concerns, psychological problems). In these cases, it may be best to refer to The Safeguarding Team to seek further assistance
- Be aware of the limitations of their knowledge and expertise
- Hold tutorials in an appropriate location, offering a degree of privacy but with good visibility
- Not get involved in a 'counselling relationship' with a student, even if trained in counselling. Not only does this breach the ethical boundaries of the counselling profession, it can put the tutor in a compromising position if, at the same time, they are also required to assess a student's work.

2.16. Confidentiality

2.16.1. Unless required within an official process, never disclose information regarding students or members of staff. Be aware of being overheard on your mobile, landline telephone or on Teams, and ensure such calls are made/taken in a private environment.

2.16.2. It is important to respect a student's right to privacy. Under normal circumstances it is the policy of TBCG not to pass on personal information to a third party without the consent of the student. Clearly, information relating to a student's learning and progress (for example, attendance, academic performance) will often need to be shared with other teaching staff or Student Services, but this should be on a 'need to know' basis, and the student should be made aware that this will happen.

2.16.3. Students often discuss their own problems or pass on information to others without questioning whether what they say will go further. The student may very well assume that the discussion, particularly if it is about personal matters, will be treated as confidential.

2.16.4. Staff must therefore never agree to keep what a student tells them confidential. This is because at any time a situation may arise which requires a member of staff to disclose information. Staff will then be legally obliged to break any promises made, and will have no choice about what information must be disclosed. This breach of promise is more damaging to the student than if it had been clear to them from the start. That is why it is TBCG's policy not to agree to keep things confidential. What staff may do is agree to keep things private from other students and some colleagues, but not their line manager (or Designated Safeguarding Lead (or Deputy) in a safeguarding situation).

2.16.5. The situations in which information **must** be passed on include (This list is illustrative and not exhaustive):

- If the student discloses, or you suspect, that they are being abused
- If you are told, or you suspect, that the student is in danger of harming themselves or others
- If the information relates to a serious crime that involves a safeguarding concern.

2.16.6. In such circumstances it can be helpful, if the student starts to disclose, to explain to them that you may have to pass the information on to someone else in college.

There are some situations of confidentiality that are **never** appropriate while working with students:

- Offering absolute confidentiality - the limits to confidentiality should be explained.
- Talking about a student in a public place where the conversation can be overheard.
- Talking about a student's private business in front of other students.
- Giving out any information about a student over the telephone, email or other communication, without their consent (except in the circumstances listed above).
- Storing information about a student insecurely.

Connect with Confidence: Building Sustainable Trust, Inspiring Sustainable Growth, Creating Sustainable Impact

Make Every Interaction Count

A simple greeting can make all the difference—it sets the tone, builds trust, and helps our students feel comfortable in their learning environment. Even something as simple as a smile, a hello or asking 'how are you' can help a student feel seen, safe and valued. When our students feel they belong, they engage more, contribute more, and grow with confidence. As staff, we play a key role in fostering that sense of belonging through the way we communicate and connect. Let's make every interaction count, ensuring that every student feels acknowledged, included, and valued from the moment they walk through the door.

Notice and Respond

A supportive and effective learning environment starts with active engagement. By being visible, attentive, and responsive, we create a space where students feel seen, valued, and encouraged to succeed. Recognising their needs, reinforcing positive behaviours, and being mindful of our words and actions—including body language—helps strengthen trust and connection.

Confidence in interacting with students grows when we embrace opportunities for engagement, stepping outside our comfort zones to build meaningful relationships. Being present and approachable nurtures trust, communication, and mutual understanding.

Stand Together

We are one team, and the way we support each other matters. Whether we're teaching, cleaning, coaching or covering a front desk, every role shapes how our students experience college life. When staff feel part of a community and know others have their back, it's easier to stay positive, consistent and focused on what matters.
Standing together means stepping in when someone's under pressure, sharing ideas and good practice, and checking in on colleagues—not just when things go wrong, but day to day. It's about building a culture of trust where we help each other succeed, because when we thrive as a team, our students benefit too.

Other Relevant Safeguarding Documents

- Keeping Children Safe in Education (Department for Education)
- Child Protection and Safeguarding Policy (on Connect)
- Confidentiality Procedure (on Connect)
- Reference Documents & Guides (Safeguarding page on Connect)
- Harmful Sexual Behaviours Policy (Safeguarding page on Connect)

3. LOW LEVEL CONCERNS

3.1. Behaviour which is not consistent with the standards and values of the organisation, and which does not meet the organisational expectations summarised in this Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

3.2. We encourage the reporting of low-level concerns and all staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which infringes the Group's Staff Code of Conduct.

3.3. Details on staff responsibilities under low level concerns and the reporting procedure to follow can be found in the Low-Level Concern Procedure on Connect.

4. RESPECT

4.1. TBCG promotes a culture of caring and inclusivity in the workplace and embraces the diversity and individuality of all those connected to the Group. As such it expects all its staff to behave towards students and other staff with respect and dignity.

4.2. Any form of intimidation, bullying, sexual or other harassment, discrimination or rude/unprofessional behaviour will not be tolerated and when considering their own behaviour, staff should consider the following:

- How they would want to be treated themselves and mirror that behaviour.
- Keep an open mind to different appropriate views and ideas.
- Challenge any inappropriate language or behaviour.
- Do not exclude or isolate any team member.
- Do not get involved in 'banter' and challenge those that do.

4.3. Staff should always communicate appropriately both internally and externally of TBCG and this is covered in more detail in section 6.

4.4. All staff should be respectful of each other's workloads, whether you work directly with people within your team or you need to collaborate or seek input from other members of the organisation. When seeking input or feedback, deadlines for response should always be given and set within reasonable timescales as people will have other pressures and priorities that you will not be aware of. If a response is required urgently, then staff should ensure they contact the individual they require that response from, explain why it is urgent and discuss/agree what they are able to do to support your requirements.

4.5. When booking meetings, staff should ensure they consult with those needing to be involved either directly or through viewing their calendar, to identify availability. Meetings should not be booked immediately after previous meetings, but should allow for a comfort break. Comfort breaks should also be built into longer meetings to ensure all attendees wellbeing is considered.

4.6. Any staff witnessing or concerned about any form of discriminatory behaviour, bullying or harassment, sexual misconduct or behaviour that makes them feel unsafe should report it to the People Team or send a message with details to raisingconcerns@bedford.ac.uk

5. DRESS CODE

5.1. As we are a front facing and inclusive organisation, we want to set a tone of quality delivery and as such during term time we ask our staff to dress in appropriate business casual attire unless their role requires specific clothing. Business casual would include (but is not limited

to), shirts, blouses, jumpers, tailored skirts and trousers.

5.2. Staff must use their judgement to dress with professionalism during term time and not wear anything that would make others uncomfortable, such as clothing exhibiting inappropriate language or design or boundaries of taste and decency.

5.3. Outside of term time, staff attending campuses can follow a more casual dress code, but must still follow common sense in avoiding clothing that would make others uncomfortable.

5.4. At all times staff must consider health and safety implications in their dress and so items such as open footwear (such as flip flops), dirty / unhygienic clothing, clothing inappropriate when using machinery etc. should not be worn.

5.5. ID badges must be worn and visible at all times and must be one of BCG approved lanyards

5.6. If a member of staff forgets or loses their ID and requires a replacement, this can be issued at reception, at the cost of £2 and the old card will be cancelled.

5.7. For further details on ID cards, staff should refer to the Visual Identification Policy and Procedure which can be found on Connect.

6. COMMUNICATION

6.1. TBCG sets out within its values a culture of teamwork, caring and inclusivity. To support achieving that culture there is an expectation of staff to ensure all their communications, both internally and externally, are always of a professional standard.

6.2. When writing emails/Teams messages staff must always consider how they may be perceived by the recipient and so avoid things that can seem angry (like the use of Caps), blame or disparage the recipient or their team, use inappropriate language, enter into unprofessional judgements etc. Staff must remember that all their communications via email remain the property of TBCG and as such were the Group ever to be involved in legal proceedings, they would become fully disclosable in court and a document of public record. Additionally, communications are disclosable to an individual mentioned within them, should a Subject Access Search be requested by that individual.

6.3. Unless there is a requirement for information purposes, staff should not arbitrarily copy others (particularly managers) into emails as this both unnecessarily clogs up inboxes, but also adds unnecessary memory to the IT servers.

6.4. Email queries to a team should be sent via the team email and not to several members of the same team, as this can lead to both confusion and overlap on workloads. If a team does not have a group email, then select the person you feel is most appropriate to contact and add that if they are not the correct person, you would appreciate them forwarding the email to whomever is. Given the size of the Group it will not always be possible to provide immediate response and as such people should allow a reasonable time before sending any chases or supplemental emails as these clog up inboxes even more.

6.5. Staff emails must be set up in line with the guidelines laid out in The Little Book of Corporate Communications (which can be found on Connect), and updated with any logos that may be circulated from time to time by the Marketing team.

6.6. TBCG is committed to the wellbeing of its staff and as such, unless the matter is urgent, we should endeavour not send emails or messages (e.g. Teams, text, SMS etc.) outside of working hours Monday to Friday, over the weekend, on bank holidays or when on leave. We appreciate sometimes staff feel it is better for their wellbeing to clear down emails out of hours, but we would stress that there is no expectation on staff to work out of hours and should they choose to do so, they should use the ‘delay send’ facility in Outlook or draft and

send when they are back in, so those receiving it do not feel any pressure to respond out of hours.

6.7. Teams video and telephony calls should be answered in a professional and timely manner or if the individual is unavailable, returned within a reasonable period. Individuals should have their camera's turned-on during video calls and use appropriate backgrounds. If a camera is unable to be turned on due to technical issues, this should be reported to the IT Helpdesk immediately so it can be resolved as soon as possible.

6.8. People should also be mindful of the shared environment and the need to be considerate of talking at a reasonable volume so as not to disturb colleagues or where engaged in an important or sensitive Teams meeting or telephone conversation, they should make arrangements to take the call in a private area away from the shared office environment.

6.9. Whilst it is acceptable in general for staff to take personal calls during the working day, they must ensure that these are kept to a reasonable level and do not interfere with their work. For those working in shared offices mobile phones must be kept on silent mode and if a person does need to take a call, then they should leave the shared office so as not to disturb their colleagues with the call and not take it in areas where they may disturb others in general e.g. corridors with classrooms / offices where doors are open.

6.10. Mobile phones should be turned off or on silent during meetings or training and not in general view as alerts can still be distracting even when silent. Calls and texts must never be taken during these times (unless there is an emergency situation and then the employee should pre-notify the meeting chair/trainer they may need to.)

7. CONFLICTS OF INTEREST

7.1. A conflict of interest can occur whenever you have an external interest that may have a negative impact on TBCG or interfere with your ability to make an objective decision in your role in the Group.

7.2. There are many unique situations that may arise that create a conflict of interest and as such it is impossible to produce an exhaustive list; however, some examples would be:

- Using TBCG resources, relationships, brand or your position within the organisation for personal gain, use or expecting access to resources at a discount or free.
- Involvement in an area that competes with TBCG interests.
- Involvement in something that interferes with your work whether this be voluntary or some other form of employment outside of TBCG.
- You or a family member have an undeclared interest in a supplier or contractor bidding for work with TBCG.
- You are involved in the appointment of a company or individual providing services to TBCG where you have a relationship or investment in that company/individual.
- You take part in a public forum or debate that can have a negative impact on your professionalism and TBCG

7.3. Conflicts of interest must always be declared to your line manager who will ensure the appropriate areas of TBCG are informed that it exists.

7.4. Any staff wishing to take part in a television show should seek permission from the Executive Director of Organisational Development & People or the Executive Director of Strategy & External Affairs to ensure that it does not pose a risk to the reputation of an individual, colleagues or TBCG.

8. GIFTS AND HOSPITALITY

8.1. Small value gifts and hospitality can often occur in business relationships with external organisations such as a box of biscuits at Christmas, mugs or pens from an agency you deal with and so on.

8.2. Whilst accepting these low value gifts may seem usual practice, staff should always consider the following:

- Does accepting it leave me in a position of obligation?
- Would others knowing I have accepted it embarrass me?
- Is the organisation currently participating in a tender process and I may be breaching tender and anti-bribery rules?
- Am I placing myself and TBCG in a potential position of risk?
- Does accepting it breach the Professional Boundaries Guidelines?

8.3. Where any of these (or similar) scenarios were to exist then the gift or hospitality should be politely declined.

8.4. In no circumstances should staff ever accept cash or cash equivalents from an external organisation.

8.5. In no circumstances should staff ever accept lavish, expensive or regular gifts or hospitality from an external organisation or individual related to such an organisation.

8.6. All gifts offered to a member of staff (whether accepted or not) must be notified to the People Team so they can be included on the Register of Gifts and Hospitality.

8.7. This section should be read in conjunction with the Anti-corruption and Bribery Policy which can be found on Connect.

9. COMPANY POLICIES

9.1. All staff have a responsibility to read and abide by all TBCG policies, which can be accessed on Connect.

10. DRUGS AND ALCOHOL

10.1. TBCG recognises that alcohol and drug abuse problems can have a detrimental effect on an individual's behaviour and the Group as a whole and therefore has a responsibility to both students and staff to ensure that these risks are minimised. Where concerns are raised TBCG will do all it can to support a staff member in seeking help for a problem in this area but this must be balanced against the need to ensure the safety of students and other employees. Staff wishing to raise concerns can do so by emailing the name of the colleague and details of the concern to raisingconcerns@bedford.ac.uk.

10.2. The full Drugs & Alcohol Policy for staff can be found on Connect.

11. PERSONAL RELATIONSHIPS BETWEEN STAFF

11.1. Whilst personal relationships often occur at work, or partners/family/close friends are attracted to work for an organisation where they know the individual has a positive experience, certain boundaries need to be adhered to in order to ensure no situations of favouritism or collusion occur, or that the individuals concerned are at risk of false allegation.

11.2. Applicants are required to declare any prior relationships when applying for a Group role, and this should also be bought to the attention of the line manager by the staff member concerned, and if the applicant is successful then the details should be passed to the People

Team to be added to the Relationship Register. Any staff member related to an applicant must not be involved in their recruitment, vetting or onboarding and also cannot directly manage any individual recruited where a prior relationship exists.

11.3. Where a relationship develops between staff members during employment both individuals should inform their line managers immediately. Where the individuals are working in the same department, the manager should risk assess the situation to ensure any risks to students, other staff and the individuals themselves are identified and managed.

11.4. Those involved in personal relationships should not be directly managed by either party, nor should the individual in the management role have any influence over the other parties' recruitment, pay, line management, appraisal, transfer, promotion or disciplinary proceedings or indeed anything that may be perceived as providing the other party with an advantage over their peers.

12. USE OF TBCG PROPERTY

12.1. All staff at TBCG are responsible for ensuring any property belonging to the Group is not subject to misuse, loss damage or theft. This would include physical assets such as laptops or intellectual property with full or joint ownership by TBCG.

12.2. TBCG property and resources are provided to enable staff to fulfil their roles and should not be taken or used for the benefit of any staff business interests outside of TBCG without the express permission of their Campus Principal/Group Director /Vice Principal/Director.

12.3. TBCG brands are the intellectual property of the Group and as such must not be used outside the Group without the express permission of the Executive Director of Strategy & External Affairs.

12.4. Laptops can be used for general internet use outside of work or during breaks, but all usage must follow the IT – Acceptable Use Policy and incur no financial costs to TBCG.

12.5. TBCG vehicles must only be used in carrying out the duties of your role, and not for personal use.

Other Relevant Documents Available on Connect

- Anti-corruption and Bribery Policy
- Discipline, Grievance & Appeals Policy
- Bullying & Harassment Policy
- Equality & Diversity Policy
- Freedom of Speech Code of Practice
- IT – Acceptable Use Policy
- Keeping Staff Safe Policy
- Management of Vehicles Policy
- Mobile Computing Devices and Remote Data Access Policy
- Network Security Policy
- Physical Intervention Policy
- Conflicts of Interest Policy
- Social Media Policy