

**LINCOLN COLLEGE**

**CODE OF CONDUCT**

**POLICY CO/OT/30**

**SPONSOR**  
Chief People Officer

## **Equality and Diversity Statement**

Lincoln College strives to treat all its members and visitors fairly and aims to eliminate unjustifiable discrimination on the grounds of gender, race, nationality, ethnic or national origin, political beliefs or practices, disability, marital status, family circumstances, sexual orientation, spent criminal convictions, age or any other inappropriate grounds.

# LINCOLN COLLEGE

## CODE OF CONDUCT

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# **LINCOLN COLLEGE**

## **CODE OF CONDUCT**

### **1 PURPOSE**

- 1.1 The purpose of this Code of Conduct is to give all employees guidance on how the College expects them to behave. It cannot cover every eventuality and further guidance should be sought from an employee's line manager or People Services, if they are unsure of the standards expected of them.

### **2 AIMS**

- 2.1 The aim of the Code of Conduct is to provide appropriate guidance for staff in terms of acceptable behaviour and conduct at work.

### **3 INTRODUCTION**

- 3.1 The Advisory, Conciliation and Arbitration Service (ACAS) recommend that all employers establish and publicise standards of conduct at work. This helps employees to understand the standards of conduct and behaviour expected of them, as well as assisting managers to maintain proper standards of discipline at work and where necessary, to employ the appropriate procedures.
- 3.2 Colleges are public sector institutions. This demands a high level of accountability and underlines the importance of a good reputation. The public is entitled to demand of an employee of the College, conduct of the highest standard, as public confidence in their integrity would be undermined were the least suspicion to arise that they could in any way be influenced by improper motives.
- 3.3 It is the College's duty to protect employees against unjustified allegations of wrong doing and adherence to this Code is essential for this purpose. However, it should be noted by all employees that failure to comply with the standards detailed in the Code may result in disciplinary action.

### **4 RELATIONSHIPS AND PERSONAL INTERESTS (FINANCIAL AND NON FINANCIAL)**

- 4.1 Mutual respect between employees and members of the Board of the Corporation (Governors) is essential. Where close personal relationships between employees and individual Governors exist, there is a need for care to be taken to avoid inappropriate standards of conduct.

- 4.2 It is recognised that employees can form romantic relationships whilst at work. Where a romantic relationship develops between an employee and their line manager, concerns could emerge that relate to issues of confidentiality, conflict of interest and lack of impartiality. In this case, a disclosure must be made to People Services to ensure that an appropriate framework is established.
- 4.3 Where a romantic relationship develops between an employee and a member of the Group Leadership Team or Senior Leadership Team, a disclosure must be made to People Services. This ensure that an appropriate framework can be established as above. If a relationship causes problems for either party (for example, where there is a power disparity), advice can be sought from People Services.
- 4.4 Employees who engage or supervise contractors or who have any other official relationship with contractors and have previously had or currently have a relationship in a professional, private or domestic capacity with contractors, should declare their relationship in writing directly to their line manager, who should decide what action is necessary and convey that decision to the employee in writing. The line manager should ensure a copy of the correspondence is placed on the employee's personal file and a copy sent to the Governance Officer who will maintain a central record.
- 4.5 Employees are required to give written notice of any contract or proposed contract, with which the College is involved and in which the employee has a financial or non-financial interest (either direct or indirect) as soon as the employee becomes aware of it. All contracts or proposed contracts are covered by this requirement, including contracts for the regular supply of goods and services. Details of personal interests should be declared in writing directly to their line manager using the form in Appendix 1, who will decide what action is necessary and convey that decision to the employee in writing. The line manager should ensure a copy of the correspondence is placed on the employee's personal file and a copy sent to the Governance Officer who will maintain a central record.
- 4.6 Appendix 1 must be completed as a matter of course by members of the Group Leadership Team and the Head of Estates and Facilities and returned to the Governance Officer.
- 4.7 To avoid suggestions of any impropriety, employees with a financial or non-financial interest in a matter should not only declare that interest, but also seek to distance themselves from involvement in that item. This may mean passing an issue to another colleague to deal with. Where this is not possible, employees must be open about the interest in all associated dealings.
- 4.8 A line manager to whom any such interest, association, relationship or friendship is declared shall consider what steps to take to ensure the employee concerned is not placed in a position where private interests and official duties may conflict.
- 4.9 No employee shall purchase for private purposes goods or services from a firm that has dealings with the College where the firm is offering

preferential terms to the individual employee (directly or indirectly) because of a contractual, business or other relationship with the College, without first obtaining written permission from the line manager, who should ensure a copy of the correspondence is placed on the employees personal file. This equally applies to the ordering of extra supplies against a contract where the intention is to use the goods privately and pay for them at the College's contract price. This also precludes employees from using, for private purposes, any special trading cards that the College may hold for College business.

## **5 TENDERING**

- 5.1 Employees must exercise fairness and impartiality in dealing with all customers, suppliers and other contractors.
- 5.2 Employees who are privy to confidential information on tenders or costs for either internal or external contractors should not disclose that information to any unauthorised party or organisation.
- 5.3 Employees should ensure that no special favour is shown to current or former employees or their partners, close relatives or associates in awarding contracts to businesses run by them or employing them in a senior or relevant managerial capacity.
- 5.4 Employees must not use their position and knowledge of the College to gain access to and provide information, which puts a particular contractor or anyone else in a better position than any other contractor tendering to undertake work.
- 5.5 Employees involved in the purchase of work, goods, materials and services must comply with the relevant procedures and financial regulations approved by the College.

## **6 CORRUPTION**

- 6.1 The Bribery Act came into force on 1 July 2011. The Act introduced new offences for acts of bribery by individuals, or persons associated with relevant organisations. The penalties are severe for any employee convicted under the Act, which could mean a criminal record with ten years' imprisonment and unlimited fines.
- 6.2 Employees must therefore be aware that it is a serious criminal offence for them corruptly to receive, or give, any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour or disfavour to any person while the employee is acting in his or her official capacity. If an allegation is made it is for the employee then to demonstrate that any such rewards have not been corruptly obtained.
- 6.3 The absence of actual corruption is not, in itself, sufficient. Avoidance of any grounds for suspicion of corruption is also important at all times and particularly where contracts are being negotiated. Employees should, wherever possible, avoid negotiating with a potential contractor, supplier or purchaser on a one to one basis. Where any one to one negotiations are involved, including telephone negotiations, the employee must ensure

that all steps in the negotiations are recorded and that their line manager has been made aware of and has approved those steps. Financial regulations and the approved procedures of the College must be followed on all occasions.

## **7 GIFTS AND HOSPITALITY**

- 7.1 You must not accept any cash gift, or personal gift with a significant monetary value, under any circumstances. Items of nominal value (£25.00 or below) such as a box of chocolates or free promotional pens, calendars and similar items, may be accepted.
- 7.2 Personal gifts may not be solicited under any circumstances. Examples of gifts that should be refused are gifts of free membership or subscriptions, free goods or services that are normally provided at a cost, large gifts from parents/guardians.
- 7.3 When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
- 7.4 All gift offers beyond those outlined in 7.1 must be recorded in the gifts register.
- 7.5 To achieve propriety in the use of public funds, gifts for members of staff who are leaving or have a personal celebration should only be bought with voluntary contributions from colleagues.
- 7.6 Departments may, at the budget holder's discretion, use funds responsibly for the purpose of staff wellbeing and recognition, e.g. thank you cards for recognition or flowers to recognise a bereavement. The value should be reasonable and not exceed £25. It may be appropriate to consider a charitable donation through voluntary contributions instead. Alcohol must never be purchased under any circumstances.
- 7.7 All gifts to staff or individuals must be recorded on the gifts register.
- 7.8 You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of the College. The timing of hospitality in relation to procurement or purchasing decisions that the College may be taking is especially sensitive. Above all, you must never solicit hospitality. As a general rule, you should not accept hospitality that the College would not reciprocate in similar circumstances.
- 7.9 When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If necessary, you should pay your share of any costs, and claim these in the ordinary way.
- 7.10 You may accept modest working meals and light refreshments without making any declaration.

- 7.11 Other hospitality may be accepted, for instance where:
- there is a genuine need to impart information or represent the College in the community
  - an event is clearly part of the life of the community or where the College should be seen to be represented
  - the hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal
- 7.12 Before accepting any hospitality, approval should be sought from the Chair in respect of Governors or the SLT in respect of employees. In exceptional circumstances retrospective approval may be obtained. All hospitality received must be recorded in the College hospitality register with the exception of working meals, receptions for visiting staff or business colleagues etc.
- 7.13 Celebratory meals or events beyond working meals must only be funded via voluntary contributions from participants. Approval from the budget holder should be sought for anything beyond working meals and recorded on the gifts and hospitality register.
- 7.14 Any hospitality provided should not be extravagant or excessive in nature and not exceed £25 per head.

## **8 USE OF RESOURCES**

- 8.1 Any facilities, equipment, tools, etc, provided by the College for use in an employee's duties should be used only for those duties and for no other purpose except where the College has agreed to private use. This applies to all facilities and property. There are approved arrangements for the use of some services for private purposes on payment of charges determined by the College, for example, private photocopies, etc. Where approved private use takes place, the appropriate charge must be made.
- 8.2 Employees should refer to relevant College policy and seek permission as appropriate for the use of specific resources. A full College document search can be accessed via the shared drive.

## **9 OUTSIDE COMMITMENTS**

- 9.1 No personal business activity or outside work of any sort may be undertaken by employees during their normal working hours for the College. Similarly, no College equipment, accommodation or resources must be used in connection with these activities.
- 9.2 Employees should refer to their contracts of employment or contact People Services for clarification on their contractual obligation to seek approval to undertake outside work or engagements.
- 9.3 Although it is accepted that employees' off duty hours are their personal concern, all employees should avoid situations whereby their work and personal interests conflict or may appear to conflict.

## 10 TRAVEL AND SUBSISTENCE CLAIMS

- 10.1 The reclaim of travel expenses and subsistence should be consistent with the principle of value for money and the need for efficiency and effectiveness.
- 10.2 No expenses or payment is to be received or accepted by an employee from any source outside College financial systems.
- 10.3 Employees are not permitted to accept free or subsidised travel or subsistence or hospitality without the agreement of their line manager.
- 10.4 A workplace is classified as 'temporary' if you expect to attend it for a limited duration or a temporary purpose, lasting 24 months or less. If your attendance lasts, or is expected to last, more than 24 months, the site becomes a permanent workplace. Once it exceeds this threshold, you instantly lose the right to claim expenses for that journey.
- 10.5 If you spend, or are likely to spend, 40% or more of your total working time at that specific place, it is generally treated as a permanent workplace.
- 10.6 If you choose to work from home when you have a permanent office elsewhere, it does not make your home a workplace. Therefore, commuting from home to your central office is still classed as ordinary commuting and cannot be claimed.
- 10.5 When claiming travel from home to a temporary workplace, HMRC assesses whether the trip qualifies as a genuine business journey rather than an extension of your ordinary commute.
- **Same distance or shorted:** HMRC may deny the claim if the temporary workplace is closer to your home than your permanent place of work (or roughly the same distance), as it is essentially your regular commute under a different guise.
  - **Passing on the way:** if the temporary workplace is geographically on the way to your permanent workplace, you can generally only claim the extra mileage incurred beyond your normal daily commute.

## 11 DRESS/APPEARANCE

- 11.1 In the interests of security and presenting a professional approach to students, all staff must wear their identity badge when on College premises.
- 11.2 Staff should dress in a way that is:
- **Appropriate for the activities of the day** (e.g., teaching, workshops, meetings, learner support, events).
  - **Safe**, particularly in practical or technical environments.
  - **Respectful and inclusive**, recognising the diverse community we serve.
  - **Presentable**, meaning clean, tidy and suitable for a work environment.

11.2 It is essential that all staff attend work looking clean and smart, specifically all staff are required to dress professionally and appropriately, in accordance with the nature of their work. Smart-casual clothing or 'business casual' is acceptable across most areas of the College and includes:

- Dark blue or black jeans/denim in good condition
- Branded College hoodies
- Smart dress trainers or practical footwear
- Polo shirts or similar tops
- Tailored shorts in hot weather during the summer term
- Lincoln College uniform

11.3 Unacceptable attire includes the following:

- Clothing that is dirty, frayed, or damaged
- Revealing, transparent, ripped or excessively tight/baggy clothing
- Clothing displaying slogans, images or symbols that could cause offence, undermine professionalism, or damage the College's reputation
- Caps or hats worn indoors (unless for cultural, religious or health reasons)
- Items that breach health & safety requirements in specific curriculum areas (e.g., open-toed shoes in workshops)
- Running trainers, espadrilles, crocs, flip-flops or dirty/frayed footwear
- Non-College branded hoodies
- 'Traditional' light blue denim of any form e.g. jeans, dresses, shirts etc.
- 'Cargo' pants or shorts of a similar nature that are not seen as smart or tailored

11.3 The College has a relaxed dress code policy that applies to the weeks where it is non-term time noting that the requirement to dress appropriately for work still applies. If staff are involved in hosting external visitors' or other more formal events such as Open Days, during these periods, the expectation is to revert to business attire as the most appropriate form of dress in most cases.

## **12 APPOINTMENT AND OTHER EMPLOYMENT MATTERS**

12.1 Employees involved in appointments should ensure that these are made on the basis of merit in accordance with the procedures laid down in the College's Code of Practice on Recruitment and Selection. In order to avoid any possible accusation of bias, employees must not be involved in any appointment where they are related to an applicant, or have a close personal relationship outside work with him or her.

12.2 Similarly, employees must not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative or partner.

12.3 Employees need to be aware that there is a contractual requirement to disclose any criminal convictions occurring during any period of employment. Additionally, employees are required to declare that there

have been no changes in relation to their background employment checks on an annual basis. This includes being subject to a prohibition order, an interim prohibition order or any changes to circumstances related to DBS/Barred List checks. Employees also need to be aware that the College is notified of any arrest(s) to ensure that any safeguarding issues are identified in respect of working with children and vulnerable adults. All declarations are made in the People Services system

- 12.4 Awarding organisations must be updated where conflicts of interest arise. Furthermore, employees must declare to People Services if through teaching, invigilating and/or assessing, they will come into contact with a learner they are linked with via family connections. All staff are asked to complete a declaration in the People Services system on an annual basis.
- 12.5 In the event that any allegations of gross misconduct are made against any employee in respect of their conduct outside the workplace, they are obliged to notify the College immediately. This includes any allegations made in the course of any secondary employment or holding a public appointment.

# APPENDIX 1

## Declaration of interests of employees of Lincoln College



Listed below are my interests which I have been asked to declare by Lincoln College.

**Other remunerated employment, office, trade, profession or vocation**

*If none, state none.*

**Financial interests regarding College contracts**

*If none, state none.*

**Directorships, governorships, charity trusteeships**

*If none, state none.*

**Personal/Romantic relationship interests**

*If none, state none.*

To the best of my knowledge, the above information is correct. I give my consent for it to be used for the purpose described in the Code of Conduct Policy, but for no other purpose.

PLEASE RETURN THE FORM TO THE GOVERNANCE OFFICER

Name: (print) \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

(line manager on behalf of Lincoln College)

## APPENDIX 2

### Declaration of gifts / hospitality by employees of Lincoln College



Listed below are any gifts / hospitality which I have been asked to declare by Lincoln College.

#### **GIFTS**

**Description of gift(s):**

**Estimated value of gift(s):**

**Name of organisation supplying gift(s):**

**Date received:**

#### **HOSPITALITY**

**Description of hospitality offered:**

**Name of organisation supplying hospitality:**

**Date of event:**

To the best of my knowledge, the above information is correct. I can confirm that I have received the permission of the Chief Finance & Compliance Officer (or other designated officer) to accept the gift(s) / hospitality in accordance with the College's Code of Conduct.

PLEASE RETURN THE FORM TO THE GOVERNANCE OFFICER

Name: (print) \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
(Governance Officer of the Lincoln College Corporation)