**Code of conduct policy**

**Scope**

This code of conduct is intended to ensure that there is no conflict of interest between the duty of staff to serve the organization and to ensure that no such conflict is perceived by third parties to exist.

1st Healthcare expects all employees to act with the highest standards of integrity behaviour, and expects staff to use their informed judgement in the professional performance of their duties. If a situation arises where you are unsure of the proper course of action, seek advice from your manager or senior member of staff, as appropriate.

It is a condition of employment that staff observe the Code of Conduct at all times. The Code is an important tool in enforcing behaviour and breaches can lead to disciplinary action. The Code will be reviewed regularly but may be amended at any time by management in the light of business needs. Any such changes will be communicated to staff.

This document applies to all staff. For the purposes of this document:

* ‘customers’ refer to service users and external stakeholders.
* ‘staff’ refers to permanent and temporary employees and agency staff.

**Framework**

**The Code of Conduct is based on three main points of reference:**

**1) The organization’s values.**

* Responding to what our customers say
* Providing excellent and reliable services
* Enabling customer choice
* Empowering our staff to act responsibly
* Inspiring those who work with us

**2) Reflect the principles set out by the Nolan Committee in its work on standards in public life.** These are:

* Selflessness – Decisions are to be taken solely on the basis of the values and objectives of the organization. Do not take decisions in order to gain financial or other material benefits for yourself, your family or friends.
* Integrity – Avoid placing yourself under any obligations, financial or otherwise, to outside individuals or organizations that might influence you in the performance of your duties.
* Objectivity – In all aspects of service delivery, making appointments or choices will be made on merit and value for money.
* Accountability – You are accountable for your decisions and actions and you must submit yourself to whatever scrutiny is appropriate for your position.
* Openness – Be as open as possible about all the decisions and actions which you take. You should be able to give reasons for your decisions, and restrict information only when demanded by confidentiality.
* Honesty – You are required to declare any private interests relating to your duties and take steps to resolve any conflicts arising in a way which protects the reputation and values of 1st Healthcare.
* Leadership – You are expected to promote these principles through leadership and by example.

**Policy statement**

This code sets out standards expected of all employees within 1st Healthcare. All members of staff are expected to familiarize themselves with its contents and to apply its principles in word and in practice whilst they remain in 1st Healthcare’s employment.

All staff are required to acknowledge this policy and their understanding of it at supervision and appraisals recording systems.

**Criminal Records**

Staff are required to undergo a Disclosure and Barring System (DBS) check in accordance with 1st Healthcare’ recruitment and selection policy at any time during their employment. Staff are also required to advise their service manager of any new or undisclosed criminal record on an on-going basis.

**Fraud, Theft and Bribery**

It is a serious criminal and disciplinary offence to corruptly receive any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything or showing favour to any person or organization.

Staff who become aware of the possibility of fraud, theft or bribery having taken place must report the reasons for their suspicions to their manager and follow the steps as outlined in the procedure. The organization will report all such cases to the police.

Staff who commit fraud, theft or other illegal activity outside of the working environment are potentially in breach of the organization’s Code of Conduct. Disciplinary action may be taken against members of staff who engage in such activity, or whose actions bring the organization into disrepute.

**Customer Experience**

All employees are expected to treat service users with courtesy and respect at all times. From time to time the organization will have to deal with difficult customers. In such circumstances staff are expected to maintain high standards of professionalism and fairness. Rudeness to our customers is not acceptable under any circumstances.

Staff have a duty to be aware of and work to publish service standards which apply to the organization. The general actions, behaviour and demeanor of staff at work are expected to be such as to present the organization as a professional and effective organization. Staff should avoid doing things which might imply a sloppy or uncaring attitude, such as leaving offices untidy.

**Policies, Procedures and other Regulations**

Current policies procedures are to be followed at all times. If you feel that procedures could be improved, discuss this with the service manager or feedback through staff survey.

Disciplinary Rules: Staff committing any of the acts of misconduct listed below are putting themselves at risk of immediate dismissal. The list is not exhaustive.

* Serious breaches of the organization's rules, policies, procedures or Code of Conduct;
* Failure to declare a serious conflict of interest;
* Theft, fraud and the deliberate falsification of records (including medical records);
* Bribery, corruption or the improper use of position within the organization for personal gain:
* Willful or negligent damage to, or misuse, or unauthorized use of any property or facilities of the organization, its customers or partners;
* Working whilst under the influence of alcohol or non-prescribed drugs;
* Serious negligence which causes or might cause loss, damage or injury;
* Serious insubordination;
* Discrimination on the grounds of race, sex, disability, sexual orientation, religion or belief or age;
* Harassment, bullying or victimization of another employee, tenant or customer;
* Violent, dangerous or intimidatory conduct;
* Serious breach of confidentiality (subject to the Public Interest (Disclosure) Act 1998);
* Serious infringement of health and safety rules;
* Potentially or actually bringing the organization into serious disrepute;
* Downloading of pornography whilst at work;
* Breaches of the organization's legal and policy obligations to avoid conflicts of interest;
* Being concerned or interested in action which is damaging or anti-competitive to the organization;
* Criminal offences, including those committed outside of working hours, which have a significant adverse effect on the organization's reputation or the Employee's suitability for his/her post.
* Persistent or repeated Absence Without Leave (AWOL);
* Serious breach of any other policy; and
* Action that will lead to a loss of trust and confidence in the employee.

**Confidentiality**

1st Healthcare’s values make a commitment to the open conduct of its business. However, there will be times when high levels of confidentiality are required. Staff must abide by procedures designed to protect the confidentiality of information held about customers and staff in accordance with the Data Protection Act 1998 / General Data Protection Regulation (GDPR) 2018.

Information about customers, staff or board members is not to be disclosed to third parties without due authorization, or without the customer’s written consent. In exception to this, there may be situations where information may be shared with a third party, for example if a customer poses a danger to him/herself, or if required to do so by law. If staff are unclear about whether to share information, they should seek advice from their line manager.

Confidential business information is not to be disclosed to external parties unless it is appropriate to do so and only with permission. This would include matters relating to the organization’s finances, future development programs, discussions with potential partners and contract proposals but staff who have any doubts are expected to seek clarification from their line manager before disclosing any information which might be commercially sensitive.

Action may be taken against staff who willfully or neglectfully disclose information of a confidential, sensitive or personal nature.

**Harassment**

A detailed Grievance, Bullying and Harassment Policy and procedure for staff is in place across the organization, which covers harassment, bullying, victimization and discrimination. The harassment of other members of staff or customers, for whatever reason, is considered to be a serious breach of the Code of Conduct and may be regarded as gross misconduct. If a member of staff makes vexatious claims against others, they are advised that this may result in action being taken against them.

Staff must not read, view or display materials in the workplace which other people might find offensive, or use language, or behave in a way, which colleagues or customers might find offensive.

**Gifts and Hospitality**

As a general rule, personal gifts to employees from service users and service users’ relatives should not be accepted. It is acknowledged and accepted practice that gifts are often received at Christmas from service users and stakeholders. In such circumstances, these should be disposed of in line with the organization’s Gifts and Hospitality Policy.

No hospitality of an extravagant nature can be accepted by staff, for example free tickets to sporting events, concerts, concessionary rates, paid holidays and. As a guide, lunch or evening hospitality can be accepted up to the value of £5.

All offers of hospitality are to be recorded in Gifts and Hospitality Register. The Register should record whether the hospitality was accepted or declined and if accepted, the reasons why. Hospitality given on behalf of the organization is also to be recorded in the Register.

The organization’s Property and Assets

Staff are expected to take reasonable measures to protect the organization’s property and assets from theft, damage or misuse and report any incidents immediately to the manager.

All property must be reasonably protected and stored in a safe place when not in use. All confidential documents are to be locked away when unattended and properly disposed of when necessary.

All documents and records remain the property of 1st Healthcare. When a member of staff’s employment with the organization comes to an end, they are required to return any such documents to the organization, or at any other time on request.

**Health and Safety**

Employees have a duty to make themselves familiar with, and act in accordance with the organization Health and Safety Policy. This includes:

* observing all procedures, following all guidance and any other related rules,
* following instructions given by managers,
* reporting promptly to management, all accidents, near misses and damage, whether or not injury or loss has occurred,
* reporting promptly to immediate line manager, all hazards of which they become aware,
* co-operating with the organization to enable it to carry out statutory duties imposed upon it in respect of health or safety,
* attending mandatory training,
* not interfering with, or misusing, any equipment or materials provided in the interests of a safe or healthy working environment
* observing lone working guidance where appropriate.

**Alcohol, Illegal Drugs and Substance Abuse at Work**

Alcohol, drugs or substance abuse impairs judgement. Customers, colleagues and members of the public may be put at risk if a member of staff undertakes their duties whilst under the influence of alcohol, drugs (including certain prescribed medication) or other substances. Abuse of any such substance at work, or which affects your work, will be treated as serious misconduct and appropriate action will be taken.

The organization does not allow the drinking of alcohol whilst on duty. This is inappropriate, particularly when dealing with customers or attending meetings at which you are representing the organization. This includes drinking alcohol during lunch hours when staff are not on duty but which may affect an individual’s performance on returning to work.

Managers are expected to take appropriate action against any member of staff in such circumstances. 1st Healthcare actively encourages the reporting of incidents which may bring the organization into disrepute.

**No Smoking Policy**

There is a No Smoking Policy throughout the organization’s premises and sites. Staff are not permitted to smoke whilst on the organization’s premises. Whilst staff are permitted to have smoking breaks where they are allowed to smoke outside of the organization’s premises these must be on the basis of a minimal number during the course of the working day

**Dress Code**

Staff are expected to dress appropriately to undertake their normal duties. This includes appropriate dress for wearing on site or for undertaking non-office type duties. Where staff meet clients or external bodies on a regular basis smart business dress, not casual clothing, should be worn. Appropriate business dress should not cause offence or embarrassment and may consist of:

* skirts/dresses
* blouses (with or without long sleeves)
* saris or other formal cultural or religious attire
* trousers, shirts, jackets
* shoes.

Regardless of where staff work in the organization, they are also expected to be professional in their approach and appearance and wear clothing appropriate to their role. Staff should refrain from wearing:

* see-through and/or revealing clothing
* clothing where wording is a dominant feature
* clothing with offensive/political slogans or ostentatious graphical displays
* military clothing, emblems or insignia
* any other form of leisurewear - such as training suits and sports caps.

Jewelry is permissible, in certain circumstances it is not advisable to wear jewelry simply because of health and safety awareness. Staff are expected to observe and maintain high standards of personal hygiene. Additional dress codes may apply at departmental level.

**Relationships with the Press and Media**

You must not, without permission, pass or distribute to the press or media any information or materials relating to the organization.

Similarly, you must not write or email letters to the press or write media articles about the organization and its activities or write letters or articles in your capacity as an employee without prior permission. If you have particular concerns these can be addressed through the Whistleblowing Policy.

You must not, under any circumstances, make comments or statements to the press. If approached by the media, you should take details about the enquiry and pass it to the manager.

**Relationships with Customers**

Staff must be especially careful of relationships with customers and never allow any personal relationship with a customer to conflict with their best interests by bringing undue pressure to bear in matters concerning their rights.

It is important, therefore, that staff never allow themselves to be compromised by, nor take advantage of, their relationship with customers. The relationship of trust must never be abused.

Any personal relationship with a customer should be disclosed/declared to their line manager. Any such disclosures which are deemed to be a potential conflict of interest will be disclosed and discussed with the manager.

Staff are strongly advised to avoid handling customers’ money wherever possible. If there is no alternative, extreme care must be taken and any transactions dealt with in line with established procedures.

Staff are not permitted to receive loans from customers, nor should they make loans to customers from their personal money.

**3. Implementation and Monitoring**

Implementation and adherence to the Code of Conduct will be monitored on a day to day basis by manager.

**4. Conditions and exceptions to policy**

There are no exceptions to this policy.

**5. Equalities and diversity**

Individuals with different cultures, perspectives and experiences are at the heart of our business. We want to recruit, develop and retain the most talented people, regardless of their background and make best use of their talents. At 1st Healthcare, we are guided by our values in everything we do and recognize that being a diverse and inclusive employer helps us fulfil our responsibility to make a difference for our service users.

We seek to develop a work environment where we treat all employees as individuals, fairly and in a consistent way. We work within the spirit and the practice of the Equality Act 2010 by promoting a culture of respect and dignity and actively challenging discrimination, should it ever arise. We will remove unnecessary barriers for our employees seeking opportunities through training and development, promotion and career planning.

1st Healthcare recognizes and values the fact that we are a multi-cultural workforce and we share our diversity with the communities we serve.