

# Employee Code of Conduct

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## Principles

The Employee Code of Conduct sets out Babington’s commitments to our employees, as well as the responsibility we ask all employees to take to behave in a manner consistent with our Values. It sets out the standards and behaviours expected of us all when we are:

- Working with Colleagues
- Engaging with Learners and Customers
- Managing and handling Information
- Working within our Communities

We all have a responsibility to understand our Employee Code of Conduct, to follow its guidance and to create an environment in which all employees can speak up confidently if they have questions or concerns.

For our Corporate Code of Conduct detailing the policies which govern Babington’s operations and engagement with external bodies, please refer to our Babington Code of Conduct found on our website.

## Our Purpose and Values

Our Purpose and Values are the foundation of our success, and they help guide our behaviours in everything we do. What we achieve at Babington depends on how we all individually put our Purpose and Values at the centre of everything we do.

Our purpose is **Developing Better Futures**. This is a statement that speaks widely to all our customers, learners, employees and stakeholders. In particular:

**Customers:** We will work hard to partner with all our employer customers to develop their people and their organisational drivers around the skills and talent agenda.

**Learners:** At the heart of what we do – we will develop better futures for the learners that we support, whether they are employed or unemployed.

**Employees:** Our people are at the centre of everything we do – we will build a great place to work for all.

We believe that doing things in the right way is critical to us developing the culture and behaviours that will enable us to meet our vision and deliver on our purpose. As a business, our Values are at the centre of everything we do:

**Brave:** We are brave and challenge the status quo, embracing difference and change.

**Caring:** We do the right thing and are committed to working together collaboratively.

**Curious:** We are constantly curious, actively finding out how things work and why, exploring how we may do things differently to succeed.

**Determined:** We are driven to ensure we achieve and take accountability for our results.

**Passionate:** We are passionate about delivering the highest quality of service to build a legacy of excellence.

**Trusted:** We build effective relationships based upon trust by consistently doing what we commit to.

## Scope

This Code of Conduct relates to all Babington employees. The standards laid out in this document support our company policies, which are available on the Babington Intranet and have been referenced in each section below.

Failure to comply with the Code amounts to a failure to comply with Babington's policies and processes, values, and behaviours, and may result in disciplinary action in accordance with the Disciplinary Policy and Procedure.

## Commitments under the Employee Code of Conduct

### Company commitments

The Company commits to supporting employees by:

- Providing a clear set of policies which define expectations across the business.
- Providing appropriate training, guidance and information to ensure we are all doing the right thing in accordance with the policies, standards and behaviours.
- Creating a trusting environment where we encourage feedback and employees feel able to speak up and report issues without any fear.
- Listening to our employees and responding to issues and concerns in good time.

### Employee commitments

The Company expects all employees to take responsibility for doing the right thing by:

- Engaging only in actions that are ethical & legal and which meet the standards and expectations set out in this Code of Conduct.
- Being aware of this Code and its supporting policies.
- Understanding and complying with the policies, standards and behaviours which define expectations across Babington.
- Actively taking steps to understand training requirements, including completing mandatory training as part of the compliance cycle.
- Supporting colleagues in doing the right thing, feeding back and raising concerns if something doesn't feel right.

## Working with our Colleagues

### Behaviour standards

The company aim to provide an environment that values individuals equally; where all are able to learn and work free from discrimination, harassment and victimisation on any grounds, including protected characteristics. We want to create an environment which is inclusive and where differences are celebrated. We aim to foster good relationships between all members of our diverse community.

We will:

- Treat everyone with courtesy, dignity and respect.
- Be **curious** to other people's views and opinions, and value input.
- **Care** about each other, listen to one another, and encourage working together collaboratively.
- Be **brave** enough to challenge the status quo and create a **trusting** environment in which we all feel we can speak up if we observe inappropriate or unacceptable behaviour.
- Be **passionate** about what we do and base decisions on merit.
- Recognise personal bias or prejudice and be **determined** to exclude this from decisions or actions
- Take accountability for our actions and not tolerate harassment through any means, including verbal, non-verbal, physical or online.
- Manage our online presence in accordance with our expected standards of workplace behaviour and in accordance with any relevant company policies.

- Recognise that these standards of behaviour are expected at all times, both inside and outside the workplace; with colleagues, learners and customers; in our centres, online, working from home or otherwise. This includes company social events and interacting with work colleagues or work-related third parties, such as customers.

We believe that Managers set an example in their behaviour. We expect that Managers:

- Act with integrity and clearly show that doing the right thing is important.
- Create a trusting and inclusive working environment where everyone can give their best.
- Foster a culture in which employees feels comfortable raising concerns and asking for advice.
- Support employees in complying with the Code's standards of behaviours.
- Act promptly when an employee raises a concern.
- Support employees in making ethical and responsible decisions.
- Ask for advice if they do not know how to handle or respond to an issue or concern raised.
- Support employees in understanding training requirements and completing mandatory training.

Unacceptable behaviour will not be tolerated. Some examples of unacceptable behaviour are:

- Verbal (face to face or electronically) or physical abuse.
- Intrusive behaviour.
- Persistent unwelcome contact.
- Deliberately undermining someone.
- Abusive, derogatory, or offensive comments.
- Using humour to put someone else down.
- Intimidation both physically and mentally, asserting a position of superiority, or acting in an aggressive manner.

*For further information please refer to:  
2206 Dignity at Work policy*

Breaches of our expected standards of behaviour may be viewed as misconduct and dealt with via our Disciplinary Policy.

Some acts of misconduct are sufficiently serious to be viewed as gross misconduct, and Babington reserves the right to dismiss employees who commit such acts. Example of gross misconduct include (but are not limited to):

- Any breach of the criminal law, such as theft.
- Wilfully or negligently causing harm or injury to another employee, client, customer or visitor, physical violence, assault, fighting, bullying or grossly offensive, abusive, or aggressive behaviour or language.
- Causing loss, damage or injury through serious carelessness or gross negligence.
- Wilful refusal to obey a reasonable management instruction or serious insubordination.
- Serious incapacity at work through an excess of alcohol or illegal drugs, whether consumed on or off Company premises, but which affects the employee's ability to carry out their work duties.
- Bringing illegal drugs or other illegal substances or items or weapons on to Company premises.
- Logging on to sexually explicit websites, downloading or circulating pornographic or other offensive, illegal, or obscene material or using the Internet or e-mail for gambling, illegal activities or the sending of offensive e-mails to work colleagues
- Engaging in sexual activity on Group premises at any time.

- Posting derogatory, offensive, discriminatory, or defamatory comments online about the company, its employees, clients, or customers or otherwise conducting themselves online in a way that is detrimental to the company or brings the company into disrepute.
- A serious breach of health and safety rules, including acts or omissions which endanger the safety of another employee, client, customer, or visitor.
- Discriminating against, harassing, bullying, or victimising another employee, client, customer, or visitor
- Inappropriate behaviour or engagement with a learner as outlined by this code of conduct and associated safeguarding policies
- A serious breach of confidentiality, including unauthorised access of IT equipment, personnel records or communicating or leaking trade secrets or confidential information about the company or its employees, clients, or customers to third parties.
- Working for a competitor without permission.
- Engaging in an unauthorised activity which conflicts with the interests of the company, its clients, or customers.
- Bringing the company into serious disrepute, even if done in the employee's own time.
- Unauthorised absence, including failure to return from a period of annual leave or other approved leave of absence.
- Serious breaches of other policies as outlined within them

This list is not exhaustive and highlights the types of behaviour that are deemed unacceptable and classed as gross misconduct by the Company.

For further information please refer to:  
DOC 2208 Disciplinary Policy and Procedure

## Health, Safety and Wellbeing

We all have a personal and collective responsibility to create and maintain a safe and secure workplace.

The Babington Safe and Sound framework has been developed to bring together the key principles of Equality, Diversity and Inclusion, Health and Safety, and Safeguarding together.

All our employees must ensure they are clear about what their responsibilities are so that Babington is a safe and secure place to work and learn.

All employees should be familiar with the following Policies and Procedures, and those in Learner-facing roles have a particular responsibility to ensure they fully understand their responsibilities in keeping learners safe.

For further information please refer to:

3207 Safe and Sound handbook (incl. Safeguarding and Prevent policy)  
3008 Health and Safety Policy  
3009 Provision and Use of Work Equipment Policy  
3010 COSHH Policy  
3005 Health and Safety Accident, Incident and Near Miss Reporting Procedure

## Engaging with our Learners

All Babington employees must ensure every engagement with our learners (and their Managers and Employers) is in line with the behaviour standards listed above, as well as all relevant policies, including the Safe and Sound framework, the Safeguarding and Prevent handbook and the Social Media Policy.

In our commitment to Safeguarding:

- We promote the Welfare and Safeguarding of every learner.
- We believe that learners should never experience any form of abuse, discrimination, harassment, or victimisation.
- We will protect learners from radicalisation and extremism, by responding swiftly where learners are vulnerable to these issues.
- We recognise that ignoring abuse is not an option and all staff must report any concerns for the wellbeing or safeguarding of learners in accordance with this policy.

When hosting online training sessions, employees must:

- Have up to date Safeguarding training, including training about Safeguarding online, and ensure employees always act in line with our Safeguarding rules.
- Test audio & video prior to session beginning each session.
- Conduct teaching from a neutral room/background (use a Babington branded background if possible) and remove all personal items from view.
- Be alone in the room wherever possible.
- Dress professionally and use appropriate language
- Set up and agree expectations at the start of the session.
- Wherever reasonably practicable, ensure learners' cameras are always switched on.
- Not eat, smoke or vape during sessions.
- Be aware of learners' surroundings when their camera is enabled and report any concerns to Safeguarding.
- Be working from a quiet location and have childcare arrangements in place

Examples of unacceptable behaviour with a learner:

- Communicating personally with learners on personal social media sites including friending, following, commenting, posting, private messaging.
- Making inappropriate remarks, references, comments, messages or jokes.
- Intrusive behaviour – invasion of privacy including excessive questions about a learner's personal life.
- Having any form of communication (verbal, non-verbal or electronic) with a learner which could be interpreted as sexually suggestive or provocative.
- Making any sexual remarks to, or about a learner.
- Discussing sexual relationships, experiences, or preferences with or in the presence of a learner.
- Having a relationship with any learner external to the workplace.
- Intimate/inappropriate gestures, for example unsolicited gifts.
- Meeting a learner outside of the workplace, for purposes unrelated to work activity.

This list is not exhaustive and highlights the types of behaviour that are deemed unacceptable behaviour.

*For further information please refer to:*

*Safeguarding and Prevent Handbook*

*Social Media Policy*

*Acceptable use of IT Policy*

*3206 E Safety Policy*

*Low Level Concern Policy*

## Management of Information

Babington is committed to protecting the information it holds by ensuring that its information processing and communication systems are used in an appropriate manner.

All employees are responsible for the appropriate use of Company IT networks and systems, as well as protecting, storing and handling Company, personal, customer and partner information correctly.

## Company IT Equipment and Systems

We all have a role to play in helping to safeguard Company IT equipment, systems, networks and applications and will do this by ensuring we use them appropriately and responsibly.

All employees must:

- Observe and comply with security and access arrangements at our centres and report any suspicious activity.
- Protect any Company property and equipment in our care, and ensure they are not compromised, lost, damaged, misused or disposed of inappropriately or needlessly.
- Never loan, transfer, sell or donate Company property without authorisation. This includes waste, spare or discarded materials.
- Use Company property and equipment for authorised purposes only and secure Company property and equipment when not in use.

Examples of unacceptable behaviour when using Company IT equipment or systems:

- Allowing Company resources to be used for an unlawful or prohibited purpose.
- Allowing anyone access to our passwords or log ons, or allowing someone else to use our personal laptop without authority from a member of Senior Management.
- Using Company equipment for inappropriate, abusive, offensive, humiliating or intimidating communications.
- Using personal email accounts for Company business.

All activity on Company IT systems may be subject to lawful monitoring, including any personal use and storage of information.

*For further information please refer to  
2300 Acceptable use of ICT Policy  
For further information please refer to:  
2309 Information Security Policy*

## Personal Information

Personal data protection is about respecting individuals' privacy, protecting personal information and ensuring appropriate measures are in place to control how personal information is used and accessed.

We all have a responsibility to ensure that we safeguard any personal information we have access to from loss or misuse, and to ensure we are clear on our responsibilities in relation to personal information we have access to.

#### Examples of inappropriate use of handling personal data

- Sharing someone's personal data with another colleague or a third party without their permission (although where sharing their personal details with the Safe and Sound team is permitted as per the Safeguarding Policy).
- Including someone's personal email address on an email so everyone on the distribution list can see it. The bcc function should be used in these instances.

For further information please refer to:

2307 Data Protection Policy

2336 Risk Assessment and Data Protection Impact Assessment Procedure

## Working with our Communities

Babington wants to ensure that the impact we have on the communities we work in is a positive one.

More details on our Corporate position in relation to the following is available:

- The Environment
- Corporate Social Responsibility
- Building trust with our partners and regulators
- Anti-bribery and Corruption
- Gifts and Hospitality
- Managing Conflicts of Interest
- Bidding and Contract Negotiation
- Compliance with Local Laws
- Contractual and Grant Obligation
- Competition and Anti-trust Laws
- Human Rights and Modern Slavery

For further information please refer to:

2007 Environmental and Sustainability Policy

4024 Corporate Social Responsibility Policy

Corporate Code of Conduct



This document is issued on a version-controlled basis and is available to all colleagues on the corporate intranet

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