Company Rules, Conflict of Interest Policy, and Code of Conduct

Date established:	March 2009
Updated:	09/11/26
Reviewed:	Annually
Purpose:	This policy aims to set out the position of MITSkills regarding general rules of work, conflicts of interest and staff code of conduct.

Aims:

All staff at MITSkills have a responsibility to adhere to the general rules of work and to ensure that all conflicts of interest are reported:

- All staff at MITSkills have a responsibility to follow the general rules and to be aware of the potential for a conflict of interest which may arise during the period of employment.
- Inherent in this policy is the objective of protecting the integrity of MITSkills' reputation as a training provider and of the qualifications awarded to our learners.
- The policy is also designed to protect our staff by providing guidance on handling possible conflicts of interest that may arise.

This Policy:

- Defines what is meant by conflict of interest and defines the general rules of the workplace.
- Describes the role of conflict of interest in the context of working with, or for, an awarding organisation.
- Sets out the responsibilities for managing conflict of interest at each level in the organisation.
- This policy outlines some but not all examples of gross misconduct which would render you liable to summary dismissal (that is, dismissal without notice).
- It is set out as follows: general rules, followed by a specific policy on Conflict of Interest.

General Rules and Conduct

- You must not endanger the health and safety of yourself, other employees, learners, visitors, or members of the public whilst at work.

- Where you are issued with any protective and/or safety clothing, equipment, etc. Personal Protective Equipment (PPE), you must use it where appropriate and as intended. Damaged PPE must be reported to your line manager or to the SMT where your line manager is not available.

- Accidents, no matter how slight, must be reported immediately to the line manager, and recorded in the accident book and an incident form completed (see SharePoint). A copy of the incident must be inserted into the central register held by the administration team.
- You must comply with the company's Health and Safety Policy, including accident reporting.
- Follow requirements outlined in the Employee handbook.

The company requires compliance with all our policies, but the following policies have elements related to conduct and behaviour expected of staff within those policies.

  - Data Protection Policy (GDPR)
  - Health and Safety Policy
  - Driving to Work Policy
  - Lone Working Policy
  - The Internal Quality Assurance and Appeals Policy in relation to your role.
  - Safeguarding Policy – (note this has a wide range of conduct required of all staff)
  - Prevent and Anti-Extremism Policy
  - Anti-Fraud Policy
  - Anti-Harassment and Anti-Bullying Policy
  - Equality and Diversity Policy
  - Whistle Blowing Policy
  - Use of IT Equipment, Email, Internet Password and Electronic Signatures Policy

- Where these have not been adhered to, this may be considered gross misconduct.

- Staff are expected to actively promote a safe and inclusive environment, which includes challenging the behaviour of learners and staff that is not in line with the learner or staff codes of conduct and supporting policies.

- It is your responsibility to read the company policies and conform to them except where they contradict legislation or where this may impact your safety or rights. In the latter case, you must inform your manager and/or HR manager to resolve the issue. Please see SharePoint.

- You must observe all rules dealing with smoking and fire hazards. Smoking is not allowed anywhere on the premises. To prevent fires, chemicals and paints must be stored and correctly handled, and waste appropriately disposed of. The workplace is to be kept tidy and clear of debris. If in doubt, ask your line manager. In the event of a fire or a fire alarm, follow the company's Health and Safety and Emergency Procedure available on SharePoint. The policy is not to fight fire, stay safe and get out.

- You are expected to show, maintain, and develop the skills or aptitudes required for the job, particularly where those skills were claimed at the time you commenced the job. This will be reviewed from time to time, in line with the company's formal review system and or quality assurance system. In the event of persistent failure to meet the requirements of the job or to comply with company policy, procedures, or policies, the company may take disciplinary action.

- The company has a formal review system, as well as quality assurance audits, which look at the improvement and compliance with processes and procedures. You must conform to the procedures and processes of the company and cooperate with all audits. If you identify that you are unable to comply with procedures, policies or processes, you must report it to your manager in a timely fashion.

- You must act wholeheartedly in the interests of the Company at all times (and will be supported in Whistleblowing where you believe that you see a breach of legal obligations, conflict of interests, or company failure to adhere to policies, procedures, rules and standards by other staff and/or suppliers).
- You should acquaint yourself with all authorised notices displayed within your place of work.
- You must be prepared to undertake reasonable duties other than those for which you have been specifically employed.
- You must inform the Company if you contract a contagious illness.
- You are not permitted to remove any material or equipment from your place of work without prior permission.
- You must not use Company time, material, or equipment for unauthorised work.
- You must always follow the Company's working or operating procedures.
- You must wear the company-provided uniform as provided, and identification whilst at work.

Conflict of Interest Policy

Scope

The policy applies to all staff and other individuals who interact or potentially interact with the work of awarding organisations, partners, suppliers, and subcontractors. This includes individuals involved with any aspects of the creation, marketing, sales, distribution, delivery, marking or any other activity connected to all awarding bodies, tests, assessments, supporting resources and services for MITSkills' learners.

The individuals falling within the scope of this policy relate to all MITSkills' staff, including directors, employees, contractors, agency workers and any associated staff, including assessment associates, verifiers, work-based trainers, and freelance staff.

Responsibility

- The ultimate responsibility for the conflict-of-interest policy, dissemination of the policy and management of potential and actual conflicts of interest rests with the Senior Management Team within MITSkills.
- Managers in each division are responsible for communicating the Conflict-of-Interest Policy to all relevant individuals within their areas of responsibility annually.
- All departments are required to review their procedures annually to ensure that they anticipate and manage potential or actual conflicts of interest.
- Departmental meetings are required to give appropriate attention to potential or actual conflicts of interest as they arise.
- Any potential or actual conflict of interest must be documented. The Head of Department must either resolve the issue or, for issues that cannot be resolved at this level must report it immediately to a director.
- All staff have a responsibility for ensuring that they are familiar with the Conflict-of-Interest Policy and any guidelines. All individuals are required to read and understand the Conflict-of-Interest Policy and updates.
- The most important feature of the policy is the requirement that an individual disclose any activity that might give rise to a potential conflict of interest. IF THERE IS ANY DOUBT WHETHER OR NOT IT REPRESENTS A CONFLICT-OF-INTEREST REPORT IT!

Definition of what constitutes a conflict of interest.

A conflict of interest is a situation in which an individual or organisation has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances; the following are examples, but are not a comprehensive list:

- Where the training delivery function and the awarding function rest within one umbrella organisation (such as internal certification).
- When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation.

- When an individual has interests that conflict with his or her professional position.

- Where someone works for and carries out work on an awarding bodies behalf but may have personal interests – paid or unpaid - in another business which either uses the same awarding body products or services or produces similar products.

- Where an individual works for or carries out work for an awarding body, who has friends or relatives taking the same awarding bodies assessments and examinations.

- Where an individual working for MITSkills, their friends or relatives receive monetary or non-monetary reward from subcontractors, suppliers, awarding bodies, agencies, or companies looking to contract MITSkills for services.

The individual and the line manager are equally responsible for ensuring that the issue is documented carefully, and HR should be informed.

Any individual may wish to raise concerns relating to a conflict of interest directly with the HR Manager or any member of the SMT. This may be done in confidence, and they are entitled to receive a response towards their concerns. Individuals are protected under MITSkills' *Whistle Blowing Policy.*

Any person considering paid or unpaid work directly with an awarding organisation should inform their manager if they think there is any potential for a conflict of interest. A staff member must not take on any such activities that could be deemed to compete or conflict with the activities of MITSkills.

It is the individual's responsibility to complete any company-required conflict of interest training.

Company Code of Conduct

1.1 This policy sets out clear guidance on MITSkills Code of Conduct and standards of behaviour expected from all staff at MITSkills. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

1.2 Staff are in a unique position of trust and influence as role models for learners. Therefore, staff must adhere to behaviour that sets a good example to all learners within MITSkills delivery.

1.3 Staff also have an individual responsibility to maintain their reputation and the reputation of MITSkills, both inside and outside working hours and work settings.

1.4 This policy applies to all staff and volunteers in the setting regardless of their position, role, or responsibility. References to 'staff' throughout the policy relate to all of the following groups:

1.4.1 All members of staff, including teaching and support staff.
1.4.2 Volunteers, including governors.
1.4.3 Casual workers
1.4.4 Temporary and supply staff, either from agencies or engaged directly.
1.4.5 Learner placements, including those undertaking initial teacher training and apprentices.

1.5 MITSkills requires that all staff have read and agree to comply with this policy.

1.6 Breach or failure to observe this policy will result in action being taken under the MITSkills disciplinary procedures, including, but not limited to, dismissal.

1.7 This code of conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, staff are expected to exercise their professional judgement and act in the best interests of the learners and MITSkills.

2.0 Professional Behaviour and Conduct

2.1 Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. MITSkills expects staff to treat each other, learners, employers, guardians, parents, and the wider community with dignity and respect at all times.

2.2 Staff must act in accordance with their duty of care to learners and ensure that the safety and welfare of learners are accorded the highest priority.

2.3 Staff should show fairness in their treatment of learners and avoid behaviours such as embarrassing or humiliating learners, making jokes at the expense of learners, discriminating against or favouring learners and using sarcasm.

2.4 Staff must show tolerance of and respect the rights of others and should uphold the fundamental British values, including democracy, the rule of law, individual liberty, mutual respect, and tolerance of those with different faiths and beliefs.

2.5 Staff must have regard for the ethos and values of MITSkills and must not do or say anything which may bring MITSkills or the governing body into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside MITSkills and responsibilities within MITSkills. Staff should act in accordance with MITSkills policies and procedures at all times.

3.0 Dress and Appearance

3.1 MITSkills asks that all staff wear appropriate workwear where applicable and wear company ID at all times. Staff must dress in a manner that is appropriate to a professional role and that promotes a professional image.

3.2 Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is free from political or contentious slogans.

3.3 Staff should dress safely and appropriately for the tasks they undertake.

4.0 Smoking, alcohol, e-cigarettes, vapes and other substances

4.1 MITSkills is a non-smoking site. Staff must not smoke, vape or use e-cigarettes on our premises except in designated areas. Any member of staff wishing to smoke or use an e-cigarette or vape must leave the grounds.

4.2 Staff must not smoke or use an e-cigarette or vape whilst working with or supervising learners off-site.

4.3 Staff must not consume or be under the influence of alcohol, illicit drugs, or other illegal substances on or near the setting premises.

4.4 Staff must refrain from the consumption of alcohol and other substances at learner events (i.e., residential visits) both within MITSkills premises and outside the MITSkills setting.

5.0 Relationships with Learners

5.1 Staff must maintain professional boundaries with learners appropriate to their position and must always consider whether their actions are warranted, proportionate, safe, and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.

5.2 Staff must not establish or seek to establish social contact with learners for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person seeks to establish social contact, you should exercise your professional judgement in making a response and be aware that such social contact could be misconstrued.

5.3 Staff must not develop personal or sexual relationships with learners and should not engage in any sexual activity with a learner. Sexual activity does not just involve physical contact, including penetrative and non-penetrative acts.

5.4 Working Together to Safeguard Children defines sexual abuse as 'forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).'

5.5 Staff should be mindful of sections 15A and 16 of The Sexual Offences Act 2003

5.6 Staff must not make sexual remarks to a learner, discuss their own sexual relationships with,

or in the presence of learners or discuss a learner's sexual relationships in an inappropriate setting or context.

5.7 Contact with those under 19 should be through MITSkills authorised mechanisms such as official contact calls, emails, Information Advice and Guidance or teaching, coaching or assessing. Personal phone numbers, email addresses or communication routes via all social media platforms should not be used, and staff should not share their home address with learners. If contacted via an inappropriate route, the member of staff must inform the Operations Director/HR immediately.

https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf **(checked Nov 26)**

Section 15A of the Sexual Offences Act 2015 (Contained in section 67 of the Serious Crime Act 2015) which criminalises a person aged 18 years or over who intentionally communicates with a child under 16 (who the adult does not reasonably believe to be 16 or over), if the communication is sexual or if it is intended to elicit from the child a communication which is sexual. The offence is only committed if the adult acts for the purpose of obtaining sexual gratification. 3 Section 16 of The Sexual Offences Act 2003 provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education, and the person looks after children under 18 in the same establishment as the child, even if s/he do not teach the child.

5.8 MITSkills staff must not accept friend invitations or become friends with any learners of MITSkills on any social media platform. Staff should also refrain from following the Twitter ("X") or other similar social media accounts of learners or their parents.

6.0 Infatuations

6.1 Occasionally, learners or, sometimes, their parents develop infatuations towards members of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.

6.2 Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and of allegations being made against staff. Any indications of an infatuation towards yourself or another member of staff must be reported to your line manager.

7.0 Gifts/Hospitality

7.1 Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others or lead the giver to expect preferential treatment. However, there may be occasions where learners or parents wish to give a small token of appreciation to staff, for example, at religious festivities or at the end of the year.

7.2 It is unacceptable to receive gifts on a regular basis or to suggest to learners that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift, you should consult your line manager.

7.3 Staff must not accept significant gifts or hospitality from learners, parents, carers, actual or potential contractors or outside suppliers. All such gifts/offers of hospitality should be reported to your line manager and recorded.

7.4 Personal gifts must not be given by staff to learners, and any reward to learners should be in accordance with MITSkills policy, recorded and not based on favouritism.

8.0 Physical Contact with Learners

8.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with learners, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may, in some circumstances, be inappropriate. When physical contact is made with learners, it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity, and background.

8.2 Where feasible, staff should seek the student's permission before initiating contact. Staff should listen, observe, and take note of the learner's reaction or feelings, and so far as is possible, use a level of contact which is acceptable to the learner for the minimum time necessary.

8.3 It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one learner in one set of circumstances may be inappropriate in another, or with a different learner. Staff should, therefore, use their professional judgement at all times.

8.4 Staff should be aware that even well-intentioned physical contact may be misconstrued by learners, an observer or by anyone to whom this action is described. Staff should never touch a learner in a way which may be considered indecent. Always be prepared to explain actions and accept that all physical contact is open to scrutiny. Staff must not engage in rough play, tickling or fun fights with learners.

8.5 Extra caution should be exercised where a learner is known to have suffered previous abuse or neglect. Such experiences may sometimes make a learner exceptionally needy and demanding of physical contact, and staff should respond sensitively by deterring the learner through helping them to understand the importance of personal boundaries.

8.6 Staff supervising Sport should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However, they may be required to initiate physical contact with learners to support a learner to perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. Contact under these circumstances should be done with the learner's agreement, for the minimum time necessary and in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the learner.

8.7 Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority.

8.8 If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to your line manager, the safeguarding lead and recorded and, if appropriate, a copy placed on file.

9.0 Learner in distress

9.1 There may be occasions when a learner is in distress and in need of comfort as a reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

9.2 Such incidents should always be recorded and shared with your line manager. If you have a particular concern about the need to provide this type of care and reassurance, you should seek further advice from your line manager.

10.0 Showers and changing

10.0 Learners are entitled to respect and privacy whilst they are changing or showering after Sport or swimming. However, there needs to be an appropriate level of supervision in order to safeguard young people, meet health and safety requirements, and ensure that bullying does not take place. The supervision should be appropriate to the needs and age of the young learner and sensitive to the potential for embarrassment.

10.1 Staff should be vigilant about their own behaviour and announce their intention of entering a changing room. Personal and setting devices with a camera or video function should not be taken into areas where learners are showering or changing. Staff must not change or shower in the same place as learners.

11.0 One-to-one situations

11.1 Staff working individually with learners should be aware of the potential vulnerability of the learner and staff in such situations. Staff should manage these situations with regard to the safety of the learner and to themselves.

11.2 Individual work with young learners should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality, a colleague should be made aware of this and asked to remain vigilant.

12.0 Transporting pupils

12.1 In certain circumstances, it may be appropriate for staff to transport learners offsite, for example, sports fixtures, swimming lessons or other out-of-college activities. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and to respond to any difficulties that may arise.

12.2 Staff should ensure that the transport arrangements and the vehicle meet all legal requirements. Staff should ensure that the driver has the appropriate licence for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.

12.3 Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency and should also ensure all passengers are wearing correctly fastened seatbelts. Staff should never transport learners while under the influence of alcohol or drugs.

12.4 Staff should ensure that a no-smoking policy is maintained on student transport, including vapes or e-cigarettes.

12.5 Staff drivers should follow the company policy on driving with mobile phones

12.5 Before transporting 16- to 18-year-olds offsite, consent must be obtained from their parent/guardian, and staff should be aware that the safety and welfare of the learner is their responsibility until this is safely passed back to their parent/carer.

13.0 Online Safety

13.1 Staff should follow MITSkills Use of IT Equipment, Email, Internet Password and Electronic Signatures Policy

13.2 Staff must not engage in inappropriate use of social network sites, which may bring themselves, the college, or the college community into disrepute. Staff should adopt the highest security settings on any personal profiles they have.

13.3 Staff should remain mindful of their digital footprint and exercise caution in all their use of social media or any other web-based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter learners.

13.4 Staff must not make contact with learners or ex-learners, must not accept or initiate friend requests, nor follow learners or ex-learner accounts on any social media platform. Staff must not communicate with learners or ex-learners via social media, websites, instant messenger accounts or text messages. The only acceptable method of contact is via the use of MITSkills email accounts or telephone equipment.

13.5 Staff should not make contact with learners' family members, accept or initiate friend requests or follow learners' family members' accounts on any social media platform.

13.6 However, MITSkills acknowledges that staff who are also parents may wish to make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with learners' family members via social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.

13.7 Mobile phones and personally owned devices such as tablets may not be used during lessons or formal college time. They should be switched off (or silent) at all times. The Bluetooth functionality of a mobile phone or tablet should be switched off at all times and may not be used to send images or files to other mobile phones. Mobile phones and personal devices, cameras and video equipment are not permitted in certain areas within the MITSkills site, such as changing rooms and toilets.

13.9 Mobile phones and personally owned mobile devices brought into MITSkills are the responsibility of the device owner. MITSkills accepts no responsibility for the loss, theft, or damage of personally owned mobile phones or mobile devices.

14.0 Photography, video, and images of learners under 19

14.1 Many activities involve recording images as part of the curriculum, extra activities, publicity, or to celebrate an achievement. In accordance with the Data Protection Act 1998, the image of a learner is personal data. Therefore, it is a requirement under the Act for consent to be obtained from the parent/guardian of a learner for any images made. It is also important to take into account the wishes of the young person, remembering that some learners do not wish to have their photograph taken or be filmed.

14.2 Using images for publicity purposes will require the appropriate consent of the individual concerned and their parent/guardian if they are under 19. Images should not be displayed on websites, in publications or in a public place without their consent. Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.

14.3 Photographs/stills or video footage of learners should only be taken using setting equipment for purposes authorised by MITSkills and should be stored securely and only on setting equipment.

14.4 Staff should ensure that a member of the Senior Management Team is aware of the proposed use of photographic/video equipment and that this is recorded in lesson plans. All photographs/stills and video footage should be available for scrutiny, and staff should be able to justify all images/video footage made.

14.5 Staff should remain aware of the potential for images of those below 19 to be misused to create indecent images and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken. Particular care should be given when filming or photographing young or vulnerable learners who may be unable to question how or why the activities are taking place. Staff should also be mindful that learners who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.

15.0 Confidentiality

15.1 Members of staff may have access to confidential information about learners, their parents/carers, or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the learner on a need-to-know basis.

15.2 Staff should never use confidential or personal information about a learner or his/her family for their own, or others' advantage (including that of partners, friends, relatives, or other organisations). Information must never be used to intimidate, humiliate, or embarrass the learner.

15.3 All staff are likely at some point to witness actions which need to be confidential. For example, where a learner is bullied by another learner, this needs to be reported and dealt with in accordance with the appropriate procedure. It must not be discussed outside the college, including with the learner's parent or carer, nor with colleagues in MITSkills, except by a senior member of staff with the appropriate authority to deal with the matter.

15.4 Staff have a statutory obligation to share with MITSkills Designated Safeguarding Lead or Deputy Designated Safeguarding Lead any information which gives rise to concern about the welfare or safety of a learner below 19, or that might suggest a learner is in need or at risk of significant harm. Staff should pass on information without delay in accordance with MITSkills' safeguarding policy and procedures, and this should be recorded. Staff must never promise a learner that they will not act on or pass on any information that they are told by the learner.

15.5 Staff should refer to the Department of Education's document, Information sharing: advice for practitioners providing safeguarding services, for further guidance on information sharing. If you are in any doubt about whether to share, you should seek guidance from a member of the senior management team.

15.6 Any media or legal enquiries should be passed to the senior management team, and only approved staff and members should communicate with the media about the setting.

16.0 Parents as employees

16.1 It is acknowledged that some staff also have children who attend the setting as learners. It is recognised that in these cases the staff fulfil a dual role of parent and employee.

16.2 Parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations. Parent-staff should discuss any inter-role conflict with their line manager.

17.0 Whistleblowing

17.1 Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussion.

17.2 All staff have a duty to report any behaviour by a colleague which raises concern. Staff should refer to MITSkills whistleblowing policy for further guidance. This is particularly important

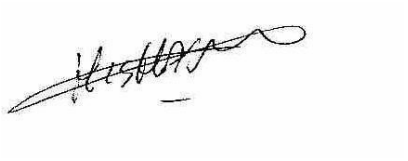
where the welfare of a learner may be at risk.

The following are examples that could be taken as Gross Misconduct

- Fighting, physical assault or dangerous horseplay.
- Failure to carry out a direct instruction from a member of the company's supervision or manager during working hours.
- The use of bad language or aggressive behaviour on Company premises, phone, social media, or other electronic medium, in front of customers, learners, awarding bodies, local government or government officials or their representatives.
- Theft of Company property.
- Wilful and/or deliberate damage to Company property.
- Incapability through alcohol or being under the influence of illegal drugs.
- Loss of driving licence on conviction where driving is all or an essential part of your job.
- Endangering the health and safety of another person at your place of work.
- Passing on confidential information which is, or could be, damaging to the Company's business.
- Deliberately falsifying official Company records.
- Receiving bribes to affect the placement of business with a supplier of goods or services.
- Immoral conduct.
- Defrauding the Company by falsely claiming to be sick.
- Using Company computers to produce private documentation without prior written permission.
- Using the Company computers for accessing the internet for any matter not directly related to the Company's business, including the sending or receiving of private e-mails without prior permission in writing from HR.
- Failing to report a conflict of interest and being shown to have received a financial or non-financial reward related to the conflict of interest.

The Company Rules should be read in conjunction with your Employee Contract and the Employee Handbook. The Company Rules on SharePoint are the most recent and should be adhered to as an extension of staff contractual responsibility.

If you are unable to comply with the Company Rules as stated, you should advise your Manager and HR in a timely fashion. HR will determine the company's position on non-compliance.

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