



Code of Conduct & Behaviour Policy



Statement of APA Procurement and Supply Training (APA) Code of Conduct & Behaviour Policy

1. Introduction

1.1. Purpose

APA's Code of Conduct & Behaviour Policy is intended to promote good practice and maintain standards of behaviour and conduct within APA Procurement Training Ltd.

The Code of Conduct provides targeted guidance that should be followed by all staff and consultants, to enable APA Procurement Training to operate effectively and ethically. It is supplemented by APA Policies and Procedures, and APA Contracts of Employment and Consultancy, and relevant employment legislation.

1.2. Duty of Care

All staff and consultants at APA Procurement Training have a duty of care towards the organisation's learners. The emphasis is on the importance of respect and safeguarding in the development of the skills and knowledge of learners which are at the heart of the culture and values of the organisation.

1.3. The aims of the Code

This Code is provided to help all who work with APA Procurement Training to fulfil their responsibilities for the care of learners by:

- Enabling them to develop and learn safely and responsibly.
- Setting clear expectations of behaviour and clarifying which behaviours constitute safe practice and which should be avoided.
- Providing clear boundaries in relation to unlawful, unruly or unsafe behaviour and the consequences of engaging in such behaviour
- Ensuring that positions of trust are not abused or misused.

The code addresses a range of key areas of staff behaviour but cannot cover all circumstances. In any instance not specifically included, all staff and contractors should prioritise the best interests and welfare of the learners while seeking the advice of managers.

Section 2: Propriety and Behaviour

2.1. Responsibility

APA Procurement Training Ltd staff and consultants have a responsibility to maintain public confidence in our ability uphold high professional standards, improve the welfare of learners and maintain the reputation of the company. It is expected, therefore, that all staff will adopt and consistently demonstrate high standards of personal conduct.

2.2. Attendance and Attitude

‘High standards’ fundamentally includes scheduled attendance at learning activities and meetings and positive participation and interaction with these activities with a view to achieving high outcomes for all stakeholders, and improvement on an ongoing basis.

All employees or contractors of APA Procurement Training Ltd, are contracted or scheduled to work a certain number of hours per week. It is expected that they honour this agreement and, where necessary, follow the correct procedure concerning arrangements for holiday, sickness or other authorised leave.

2.3. Maintaining Professional Boundaries

In all settings, both inside the workplace and beyond it, staff’s behaviour and demeanour should remain within professional boundaries, especially as regards learners. Inappropriate familiarity for example should be avoided, and staff should not make the assumption that it is acceptable practice to use touch as a means of communication. There are cultural and religious views about touching and of course sensitive issues in respect to gender and sexual orientation.

2.4. Confidentiality

Confidentiality is paramount, and staff should not share any sensitive information about learners, colleagues, clients, or about the organisation with unauthorized individuals.

2.5. Equality and Diversity

All employees and contractors are expected to read, follow and promote the organisation’s Equality and Diversity Policy and must be aware of the company’s statutory duties in this respect. Engaging in discriminatory or harassing behaviour of any kind is not acceptable and any breach of this policy is a serious matter that will likely result in termination of employment and may also be against the law.

2.6. Outside the workplace

High standards of personal conduct are of course essential at work, but staff should be aware that such expectations extend beyond the workplace. There may be

circumstances, for example, where behaviour in private life can come to public attention and bring the company into disrepute. This could include antisocial behaviour, sexual impropriety or expressions of extreme political views. These behaviours call into question or compromise the suitability of staff to work in an educational setting.

2.7. Use of Organisation Facilities and Equipment

All employees and contractors must ensure that APA Procurement Training facilities and equipment provided for their use at work are used for company business purposes only. Such facilities include classroom and office space, laptops, printers and mobile phones.

While reasonable personal use of use and mobile phones is to be expected, personal business interests must not be pursued through the use of APA facilities or equipment.

Section 3: APA Procurement Training - Behaviour Standards

The Behaviour Standards are a set of basic principles that provide the underlying basis for all staff conduct and interactions at APA Procurement Training. They reflect the values of the company and the way we should carry out our responsibilities and work together. For tutors and those involved in teaching learners, these are supplemented by the Education and Training Foundation Professional Standards.

APA Procurement Training standards of behaviour are organised on the basis of 5 key areas of responsibility for all staff and consultants working with the organisation.

3.1. Working with learners

In their dealings with learners, APA Procurement Training expects that all employees and consultants will:

- Work to maximise learners' individual and collective learning and achievement
- Treat learners with respect
- Promote high standards of learner behaviour
- Ensure their relationships with learners are professional and supportive
- Ensure that learner wellbeing and safety is prioritised at all times
- Avoid behaviour that may be construed as inappropriate, aggressive or threatening
- Respect confidentiality and not share any sensitive information about learners with unauthorized individuals

3.2. Working with colleagues

Whether in person or online, when working with colleagues, APA Procurement Training expects that all employees and consultants will:

- Be open and honest and behave professionally
- Respect confidentiality and not share any sensitive information about colleagues with unauthorized individuals
- Be supportive of colleagues and help them to learn and develop new skills
- Allow others to make mistakes and support them in learning from the experience
- Acknowledge and value the role of all colleagues
- Challenge each other and especially Directors positively and constructively
- Work collaboratively
- Look for solutions to problems
- Attend and positively contribute to meetings
- Meet deadlines whenever possible and negotiate new deadlines where required
- Respond to all forms of communication within a reasonable timeframe
- Enable swift resolution to any negative conflict
- Share relevant information with colleagues and save documents to the organisation's shared drive so that they can be accessed by all.

3.3. Working with other stakeholders

APA Procurement Training works with a range of external stakeholders, including regulators, awarding bodies, learner employer organisations, regulators, suppliers, and service providers. When working with these organisations, it is expected that all employees and consultants will:

- Demonstrate respectful, considerate and professional behaviour
- Achieve a high level of stakeholder satisfaction with the process of interacting with APA
- Comply with all aspects of the equality and diversity policy and the safeguarding policy.
- Refrain from behaving in a manner or using language that may be offensive to others.

3.4. Individual Responsibility

In all of our actions and interactions, it is expected that all employees and consultants at APA Procurement Training will:

- Take responsibility for ensuring that learner safety and wellbeing is prioritised
- Help to assess, identify and deal with both organisation and personal performance issues
- Communicate ideas and make suggestions for improvements
- Take responsibility for personal and professional development

- Bring any concerns about learners, colleagues, managers or other stakeholders to Directors
- Take responsibility for the timely delivery of tasks within their remit
- Look after APA premises and property
- Take reasonable care of their own health and safety and that of others

3.5. Collective Responsibility

It is expected that all employees and consultants will share a collective responsibility for maintaining high standards of behaviour in all of our activities, including to:

- Comply with APA Procurement Training policies and procedures, and Values
- Put the interests of the organisation above individual or positional related concerns
- Take responsibility for maintaining and improving the culture of the organisation
- Maintain an awareness of sector issues and enable the organisation to best respond to those issues through its communications and activities
- Ensure all staff for whom they are responsible are kept informed and are encouraged to feedback on organisational and individual issues
- Avoid any sort of behaviour that is likely to bring APA into professional or reputational disrepute

Section 4: Remote Working

4.1. Application of Code of Conduct to remote working

This code of conduct and behaviour policy applies across all forms of activity within APA, including remote working and online or phone interactions.

4.2. Technology

The wide availability and use of new technology including mobile phones, text messaging, emails, digital cameras and videos, and social media all pose difficult challenges for staff in maintaining professional boundaries and ensuring the safeguarding of learners. This means that there are additional behaviour standards which must be followed.

4.3. Online/Remote additional behaviour standards

All staff must familiarise themselves with APA's Digital Safeguarding Policy and follow the recommended procedures. In addition, staff should:

- Not give learners personal contact details beyond the requirements for course communications

- Ensure that telephone, text, or email contact with students is for company business and that the tone and content of the communication upholds professional standards.
- Not invite learners to personal social media or websites, such as Snapchat or Facebook. LinkedIn is professional social media and so is acceptable and even to be encouraged.
- Be very careful about behaviour in any environment that could be posted by others onto websites that may bring them or the company into disrepute.
- Take reasonable steps (including using robust passwords) to protect devices and ensure that no unauthorized person has access to APA technology and/or online spaces.

Section 5: Relationships and Social Connections

5.1. Positions of trust

In consequence of their knowledge, position and/or the authority invested in their role, all staff of APA Procurement Training are in positions of trust in relation to learners. It is essential therefore that in relationships between members of staff and learners, appropriate professional boundaries are maintained and any behaviour that may take advantage of position, or any behaviour which may be so perceived by others, is avoided.

The development of close personal relationships and especially sexual relationships is inappropriate and in the case of children and vulnerable adults is illegal.

If there are existing personal relationships between members of staff and any learner joining any programme of learning, these should be declared to managers, particularly when the member of staff will be the learner's tutor.

5.2. Social contact

There may be circumstances where the social network of a member of staff includes learners who join a training programme provided by APA. In this case, members of staff should be aware that their behaviour is in the public domain and the conditions relating to propriety and behaviour apply.

It is inappropriate for members of staff to develop new social contacts with learners while they are on the programme. While staff members should of course demonstrate friendly and inclusive behaviours, it is not appropriate for staff members to initiate social contact with a learner in a personal setting or family setting, including on personal social media.

Section 6: Financial Obligations

6.1. Financial Duty

In any activity relating to APA Procurement Training finances, all staff must act honestly, promote ethical conduct, and comply with the law, particularly as related to the maintenance of the company's financial standing and the representation of that standing to third parties.

6.2. Financial Responsibility Requirements

All staff and consultants are specifically required to:

- Carry out any financial responsibilities honestly, in good faith and with integrity, due care, competence and diligence
- Never misrepresent or withhold material facts about financial matters that may impair or compromise financial decision making
- Avoid actual or apparent conflicts of interest in personal and professional relationships
- Comply with applicable UK government laws, rules and regulations and those of other appropriate regulatory agencies such as the Education and Skills Funding Agency.
- Never take, directly or indirectly, any action to coerce, manipulate, mislead or fraudulently influence the organisation's financial decision making
- Assist in the production of complete, accurate, timely and understandable financial records where appropriate
- Take all reasonable measures to protect the confidentiality of non-public financial information relating to the company and its clients.

6.3. Breaches in Financial Duty

Any misappropriation of monies including fraudulent claims for payments or for expenses, any acceptance of bribes, or any unauthorised sale or exchange of services for personal reward will be treated as gross misconduct and may lead to dismissal.

Section 7: Safeguarding

7.1. Safeguarding policies

APA Procurement Training Ltd has comprehensive policies and procedures to safeguard and promote the welfare of learners receiving training at the organisation. It is paramount that all staff be familiar with the organisation's safeguarding policy and act in accordance with it. All staff are expected to attend regular training in safeguarding.

It is particularly important that all staff familiarise themselves with APA's Digital Safeguarding Policy and follow the recommended procedures.

7.2. Safeguarding Duty

All staff have a duty to report cases of suspected abuse where there are concerns that a learner may have been mistreated or abused, or where there is a risk to their safety. If you have any concerns these should be reported to the Designated Safeguarding Officer.

All staff must raise any concerns about colleagues with the Designated Safeguarding Officer. Indicators of concerns include:

- Behaving in a way that has harmed or may have harmed another person
- Potentially committed a criminal offence against or related to a learner or other colleague or stakeholder
- Otherwise behaved in a way that indicates that he or she is unsuitable to work with children or an adult at risk of abuse or neglect.

Section 8: Data Protection

8.1. Data Protection

Confidential information belonging to the company must not be shared by any employee or contractor working with APA Procurement Training, with any person, training provider, company or other organisation, during or following termination of employment with the organisation.

Any breaches or suspected breaches of data protection regulations should be reported immediately to managers.

Breaches of data protection regulations may result in disciplinary action. Under the law, you may also be personally liable for disclosing personal information if not authorised to do so.

Section 9: Health and Safety

9.1. Health and Safety

All employees and contractors of APA Procurement Training have responsibilities under the organisation's Health and Safety Policy and the Health and Safety at Work Act 1974.

All employees and contractors must ensure that they take the greatest possible care for their own individual safety and for that of learners, colleagues, other stakeholders, and any members of the public with whom they may come into contact during the course of their responsibilities for the organisation.

9.2. Alcohol and Drugs Policy

No employee or consultant at APA training should attend work whilst under the influence of alcohol, illegal drugs, or other substances. As everyone's role involves the safety and safeguarding of learners, and use of alcohol or other substances impairs capability at work, a breach of this rule could lead to your dismissal.

Section 10: Corporate Standards

10.1. Copyright

The copyright of all records and documents (including course materials) made by employees or contractors in the course of your employment shall belong to APA Procurement Training Ltd.

The copyright of any "scholarly work" shall usually belong to the author, such as for example contributions to books or articles.

10.2. Gifts and Hospitality

Employees must not directly or indirectly accept any gift, reward or benefit from any learner, client company, employer, supplier or other organisation with whom they have been brought into contact by reason of their duties.

Exceptions are as follows:

- Occasional gifts of a trivial nature or an inexpensive seasonal gift – such as confectionary at Christmas.
- Conventional hospitality that is normal and reasonable in the circumstances – such as lunch during in company training.

10.3. Conflict of interest

Employees and contractors working for APA Procurement Training Ltd should not, without the express permission of the Directors of the company, undertake any employment or engagement which might interfere with the performance of their duties or conflict with the interests of APA Procurement Training Ltd.

It is the responsibility of employees and contractors to declare a conflict of interest. If there is any uncertainty regarding an external engagement with another organisation, a conversation with a Director should be conducted in the first instance to determine the position.

10.4. Suppliers

Staff responsible for the purchase of supplies or equipment or, for example, the awarding of sub-contracts, should take particular care to ensure that there can be no criticism that unequal treatment has been given to other potential suppliers.

All orders and contracts must be awarded on merit and staff must not show favouritism to businesses run by, for example, friends, partners or relatives.

Any member of staff responsible for engaging or supervising suppliers or other contractors must inform the Directors if they have any kind of family, personal or other relationship with that supplier (or potential supplier).

Policy Review

This policy will be reviewed annually to ensure its effectiveness in promoting mental health and wellbeing within APA Procurement & Training and to incorporate any necessary updates or improvements.

Approved by the Senior Management Team APA.

Last reviewed February 2024.