



Code of Conduct Policy

Updated: October 2024

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Approved by CEO & Board of Trustees

The Code of Conduct Policy (the “Policy”) is based on The Matthew Project’s (“TMP”) purposes, ethos, and a core set of shared values.

TMP’s Values:

- **We hope**, believing that lives and relationships can be transformed.
- **We empower**, actively engaging with people to help them reclaim their sense of purpose and expand their choices in life.
- **We care** for the whole person, paying attention to safety and wellbeing through warm, professional relationships.

Policy Aims

The Policy aims to cover some of the standards of behaviour TMP expects from its employees, volunteers, and any contractors, sub-contractors and consultants engaged by/working with TMP (“Workers”).

It includes role-specific codes of conduct which Workers need to follow. These are:

- Skills for Care (for healthcare support workers);
- Ethical Framework for BACP members (Counsellors);
- the Code of Professional Conduct CIPD (for HR professionals); and
- NMC Code (for nurses, midwives and nursing associates).

Policy Scope

This Policy applies to all TMP Workers. TMP seeks to work only with those who accept the spirit of this Policy or whose own employer’s code of conduct policy sets out standards that match TMP’s.

Failure to comply with this Policy may result in disciplinary action.

Policy Content

The Policy provides standards for the following:

1. **Smoking**
2. **Bribery and Corruption**
3. **Hospitality and Gifts**
4. **Conduct on Matthew Project Business**
5. **Conscientious Objection**

- 6. **Dress and Appearance**
- 7. **Personal Relationships at Work**
- 8. **Working with Family Members**
- 9. **General Standards of Conduct**

Our Policy

1. Smoking

TMP recognises that second-hand smoke can adversely affect people's health. TMP has carefully considered all aspects of this policy to try and accommodate everyone's interests whilst bearing in mind it is an organisation that exists to encourage and support people to follow a healthier lifestyle.

TMP intends to:

- promote and create a healthy and welcoming environment in "The Hub" for service users and visitors, and a healthy working environment for all its Workers;
- guarantee the right of everyone to breathe air free from tobacco smoke and nicotine-related vapour whilst in The Hub and/or on TMP business;
- comply with Health & Safety and Employment Law;
- raise awareness of the dangers associated with exposure to tobacco smoke and nicotine-related vapour; and
- take account of the needs of those who choose to smoke/vape and to support those who wish to stop.

Restrictions on Smoking/Vaping

Workers are permitted to take reasonable smoking/vaping breaks during working hours, in line with those taking tea or coffee breaks.

Workers are only permitted to smoke or vape in the designated smoking area. The designated smoking area is situated towards the back of the car park at the rear of TMP's building (just outside the bike shed). An ash tray is provided to ensure any cigarette ash and ends are properly disposed of. It is important that this area is always kept clean.

Smoking is not permitted:

- In any part of TMP's building (other than the designated area).
- Outside the front and side doors of TMP's building (i.e. on the grass, pathway, or pavement).
- In any vehicle used for TMP purposes; this includes any vehicle belonging to or leased by TMP and any Worker's private vehicle if it is used to transport other Workers, service users, or members of the public whilst on TMP business.
- In sight of any service users.

Service Users, Visitors and Employees from other organisations

All service users, visitors and employees from other organisations are also required to abide by TMP's smoke-free policy. Workers are expected to inform them of the policy to reinforce The Hub's no-smoking/vaping signs.

Service users, visitors and employees from other organisations are only permitted to smoke or vape in the designated smoking area (in line with restrictions on Workers - see above).

In the event of a breach of the Policy by a service user, visitor, or employee from another organisation, Workers are required to ask them to extinguish all smoking/vaping materials. However, in doing so, Workers are not expected to enter into any confrontation that may put their personal safety at risk. Workers should seek the support of a manager.

Anyone who refuses to adhere to this policy will be asked to leave TMP's building.

Disciplinary Action

Any Worker who refuses to adhere to this policy will be liable to disciplinary action, in accordance with the Disciplinary Policy.

Workers have a role to play in enforcing the policy and they are required to deal with any observed or reported breaches. If a Worker feels apprehensive about approaching someone who is not adhering to the policy, they should seek the support of a manager.

Support for Smokers

Information on stopping smoking with support from local cessation services will be provided for smokers. The NHS Smokefree helpline number is 0800 022 4332. The helpline can offer advice and support on stopping smoking along with a website at <http://www.nhs.uk/smokefree>.

2. Bribery and Corruption

One of TMP's key values is "integrity" and our success in ensuring the integrity of our organisation is dependent on how our Workers behave. Our core values and our ethos demand that we are open and honest in our dealings with service users and, as such, this is also transferred to our dealings with external, agencies, partnerships, and other organisations.

Definitions:

- Bribery is when a person offers, promises, or gives financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly. Bribery is a criminal offence, and everyone has a responsibility to ensure compliance with this policy.
- Corruption is any form of illegal, dishonest, or bad behaviour, especially by those who hold positions of power.

Bribery and corruption have absolutely no place in TMP, and this is why we operate a strict 'no tolerance' policy towards it in all its forms whether within our organisation or through third parties.

Understanding and Recognising Bribery and Corruption

Bribery and corruption can occur in many forms so understanding them and recognising when they might occur is a key step in guarding against them. In our sphere of work, bribery could occur in situations such as tendering, appointing preferred suppliers, requesting favourable reports, or providing favourable or negative reports.

Bribery and corruption can be found at all levels within society and organisations. Bribes are not always a matter of handing over cash. Gifts, hospitality, and entertainment can be bribes if they are intended to influence a business decision (see the Hospitality and Gifts section below).

Transparency and openness are effective weapons against bribery and corruption, so it is incumbent upon us all to challenge any arrangements that compromise them.

Penalties for Engaging in Bribery and Corruption

Engaging in bribery or corruption is a criminal offence as set out in the Bribery Act 2010. As such, penalties can be severe, individuals and organisations can face punitive fines and even imprisonment.

In UK legislation it is also a specific criminal offence if an organisation fails to prevent bribery committed on its behalf. TMP takes this responsibility very seriously and we wish only to be associated with others whose standards match our own.

A conviction for a bribery or corruption related offence would have a severe detrimental impact on our reputation, create penalties for our organisation, and, more importantly, have severe consequences for those we serve. Examples of this impact could include:

- TMP being excluded from tender lists.
- TMP being overlooked when bidding.
- Loss of business.
- A decrease in public confidence.

Preventing Bribery

TMP's "no tolerance" of bribery relies on everyone within the organisation choosing to do the right thing and making a commitment to observe the following.

To always:

- comply with this anti bribery and corruption policy;
- act according to TMP's values;
- be guided by our values of openness and honesty;
- comply with our policy on gifts and hospitality;
- comply with any requirements regarding declaration of any conflicts of interest;
- have and follow robust controls, so that our financial and other records are accurate, complete, and never misleading;
- follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement;
- seek advice if unsure of how to proceed; and
- report any suspected or actual breaches of this policy promptly to a manager.

To never:

- participate in any form of corrupt behaviour;
- use any TMP funds, in the form of payments or gifts or hospitality for any unlawful, unethical, or improper purpose;
- authorise, make, tolerate, or encourage or invite or accept, any improper payments to obtain, retain or improve business;
- permit anyone to offer or pay bribes or make facilitation payments on our behalf or do anything that we would not be permitted to do ourselves;

- offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly during their public responsibilities; and
- offer or accept gifts of hospitality, if we think that this might impair objective judgement, improperly influence a decision, or create a sense of obligation, or if there is a risk it could be misconstrued or misinterpreted by others.

How to Raise a Concern

Workers who have a concern, or know, or suspect a violation of this part of the Policy, must speak up immediately. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If Workers act in good faith, believing the information that they hold is accurate, TMP will protect them, even if the information is ultimately found to be incorrect. Doing the right thing will not disadvantage a Worker's career, or adversely affect their relationships at work. TMP will not tolerate any form of harassment or bullying of someone who has spoken up in good faith.

Some concerns can be addressed by speaking to the person whose conduct is a cause for suspicion. However, this may not always be possible, and Workers should then speak to a manager. If, for whatever reason, the Worker does not feel this is appropriate they should contact HR (please refer to the Whistle Blowing Policy). All information will be treated in confidence and if the law allows it, Workers can report anonymously.

3. Hospitality and Gifts

The acceptance of gifts and offers of hospitality can give rise to suspicion of improper conduct, particularly if offered by individuals or companies that are undertaking or hoping to undertake business with TMP. It can also undermine or distort professional relationships with service users.

However, gifts can be accepted from time to time, if appropriate, as refusal can cause offense and embarrassment to the giver.

Gifts

The value of any gift should not exceed £25. Workers should exercise careful judgement in such cases. If a Worker has doubts about whether to accept a gift or not, they should discuss the circumstances with their line manager.

All accepted gifts should be reported to a Worker's line manager. The gift will be shared by the team or TMP as a whole (depending on the nature of the gift).

Under no circumstances should gifts of alcohol, or personal gifts, such as jewellery or cosmetics, be accepted.

Financial gifts can be accepted as a donation to TMP, and Workers should make it clear to the giver that this is the basis of their acceptance. The donation should be declared and sent to the Finance Department who will ensure the donor receives a thank you letter.

Hospitality

Working lunches, provided on a modest scale and on an occasional basis, are part of normal business practice and Workers are not required to obtain formal approval from their line manager to attend (For example: when sandwiches/lunch are provided at an external meeting.). However, if a Worker receives an invitation to a more formal lunch or dinner, they must seek prior permission from their line manager before accepting the invitation.

As with gifts, to decline an invitation may cause offense or embarrassment. Therefore, this must be considered when a Worker is deciding whether to accept or not and/or when a line manager is approving an invitation. Workers must also consider the timing of the invitation in relation to decisions which TMP may be taking affecting those offering the hospitality.

Invitations to other events such as launches, conferences, arts or sporting events etc. should be subject to the same scrutiny as above.

4. Conduct Whilst on Matthew Project Business

Generally, what Workers do outside of normal working hours and off TMP's premises is a personal matter and does not directly concern us. However, there are some exceptions to this and TMP will become involved where incidents occur. Examples include:

1. At social occasions or gatherings where Workers have been invited in their capacity as a TMP representative.
2. At work-related conferences.
3. Whilst Workers are working away on TMP business.
4. At office functions.
5. At other work-related social occasions or gatherings, whether organised by TMP or by a Worker and/or their colleagues.
6. In relation to social media use, where Workers make a clear association to TMP.
7. Unauthorised communication with the Press, where Workers make a clear association to TMP.

On occasions 1. and 2. above, Workers are expected to abstain from drinking alcohol and to behave in an appropriate, mature, and responsible manner, considering that they are representing TMP.

This will include, but not limited to, refraining from swearing and inappropriate humour. The same would apply to 3., except when Workers are not representing TMP, such as during the evening away from a conference or training event.

In respect of 4., no alcohol will be served at office functions hosted by TMP. For 5., Workers are not necessarily expected to abstain from alcohol, however, it must be remembered that we would still be responsible for their actions, and they would need to comply with TMP's Drugs & Alcohol Policy.

Anyone found to have harassed, or verbally, or physically abused or assaulted another Worker or associate, or who otherwise brings TMP's reputation into disrepute at such an event or via means of social media, will be subject to disciplinary action under the Disciplinary Policy. Depending on the circumstances of the case, such behaviour may be treated as gross misconduct and could lead to summary dismissal.

If a Worker's off duty conduct seriously undermines the trust and confidence that we have in them, whether at a work-related social occasion, or otherwise, under our Disciplinary Policy this could result in summary dismissal.

(Example: if a Worker commits a criminal offence off-duty, we will examine whether there is an adverse connection between the criminal offence and their employment with TMP. We will then consider whether the offence is one that makes them unsuitable for their type of work or unacceptable to other Workers, taking into account length of service, status, relations with fellow Workers and the effect on our business and reputation subsequent to a charge or conviction.)

To help reduce the risk of any detriment to TMP's reputation, only Workers who have an expressed authorisation are permitted to represent TMP in any aspect of communication with the Press (e.g. radio, newspapers, etc.)

5. Conscientious Objection

- We offer Workers the opportunity to conscientiously object to taking part in areas of care relating to:
- The Abortion Act 1967 which gives individuals the right to register their refusal to participate in abortion procedures.
- The Human Fertilisation and Embryology Act 1990 which gives individuals the right to register their refusal to participate in procedures to achieve conception and pregnancy.
- Providing services that include methods to prevent or reduce the likelihood of conception and/ or transmission of sexually transmitted infections. This being on the grounds of personal belief or religion.

We endorse good practice in all areas of our services, and we expect that Workers:

- treat people as individuals and respect their dignity;
- do not discriminate against those in their / our care;
- treat people kindly and considerately; and
- act as an advocate for those in their / our care, helping them to access relevant health and social care, information, and support.

Procedure

If a Worker has a conscientious objection to offering any of the above areas of care, they should identify this, in writing, to their manager during their induction period and before they start to have any one-to-one unsupervised contact with service users.

The letter should make it clear which of the three areas of care they are conscientiously objecting to (note that the objection can be to all areas).

If, at any time during their employment, they wish to register their conscientious objection, they should do so in writing immediately to their manager.

It is expected that in any emergency, Workers will demonstrate they acted in the best interests of a service user's care.

Once a Worker has registered their conscientious objection this will be recorded on their personnel record. We keep their personnel record confidential and will treat their conscientious objection with

sensitivity. However, they must be aware that while their conscientious objection letter will be kept confidential, should the situation arise where this Policy has to be enacted, others in the team may become aware of their position as a result of the need to transfer a service user to a colleague. It will also be necessary to inform the service user of the reason for the change of Worker. It is also recognised that in any legal proceedings the 'Burden of Proof' of conscientious objection rests upon the person claiming to rely on it.

Managers will clarify that if a Worker is the key worker for a service user who is pregnant and unsure whether to continue with the pregnancy, it is their responsibility to contact their manager, or another manager if their own manager is unavailable, immediately to discuss how to proceed. Any action decided upon by their manager will ensure that the service user is listened to, and their views are taken in to account, particularly when transferring their total care provision to a colleague who has no conscientious objection.

Managers may consider transferring the element of care relating to contraception advice to a colleague who has no conscientious objection, with the rest of the service user's care remaining with the Worker.

This decision will be made by the manager, in consultation with the Worker initially, and with the service user, if appropriate. The change in care will be recorded on the service user's file. The service user will continue to receive a service from TMP and will be referred, if required, to a primary care or specialist service.

No judgement will be made about the service user.

6. Dress and Appearance

TMP wishes to portray an appropriate and professional business image. As a result, we operate minimum standards of dress and appearance, which require Workers to dress in a manner that is suitable and appropriate to our business. The purpose of this section of the Policy is to:

- Give guidelines on dress expectations and uphold our 'smart casual' approach to clothing at work.
- Allow freedom of choice and flexibility whilst maintaining a consistent approach.
- Ensure we do not breach discrimination legislation.

Clothing & Footwear

Workers are required to be neat, clean, and presentable whilst at work, whether working on our premises or elsewhere. Clothing should be appropriate to a Worker's role and should not be revealing or provocative in any way (e.g. short shorts or miniskirts are inappropriate). However, in very hot weather, Workers are allowed to wear long, tailored shorts.

Clothing and footwear must be safe, sensible, in good order, clean and have regard to health and safety considerations (e.g., closed shoes must be worn when working in environments where there is a risk of contact with needles). In other places, open shoes or sandals can be worn, but these must not be the slip-on type (e.g., flip-flops).

If Workers are uncertain whether an item of clothing or footwear is acceptable, they should consult their manager.

Tattoos, Piercing and Jewellery

Workers may be asked to remove piercings or cover tattoos whilst at work where there is a reasonable business case for this and to ensure they convey professionalism. In all cases:

- Visible tattoos should not be offensive to others and if they are deemed offensive by their manager, they must cover them whilst at work.
- Facial piercings must be appropriate, and, in certain circumstances, Workers may be asked to remove them. If a Worker has piercings for religious or cultural reasons, they may be asked to cover these, and they must not present a health and safety risk.
- Jewellery must be appropriate to the working environment and not excessive.

Hair

Hair should be neat and tidy.

Cosmetics and Perfume

Cosmetics and/or perfume must be appropriate and not excessive.

7. Personal Relationships at Work

TMP recognises that Workers who work closely together may form personal friendships and, in some cases, close personal relationships. We do not, as a rule, wish to interfere with such personal friendships/relationships. However, we must also ensure that Workers continue to behave in an appropriate, professional, and responsible manner at work and that they continue to fulfil their job duties both diligently and effectively.

These rules are, therefore, aimed at striking a balance between a Worker's right to a private life and our right to protect our business interests. The following rules apply if Workers embark on close personal relationships at work:

- Workers must not embark on a relationship with a service user, or anyone in the service user's immediate family. For further information on this matter, please refer to the Ethical Standards in Relation to Service Users Policy.
- Workers must not allow their relationship to influence their conduct at work. Intimate behaviour during normal working hours, or on our premises is prohibited. This includes holding hands, other close physical contact, discussions of a sexual nature or kissing.
- If a personal relationship (or the breakdown of a personal relationship) starts to affect a Worker's performance, or conduct at work, then their manager will speak to them about restoring their previous levels of performance, or conduct. However, if a Worker's performance, or conduct fails to improve, or it reverts to a problem level, this will become a disciplinary matter.
- If a Worker is having or has had a personal relationship and they are found to have afforded either more, or less favourable treatment to the other Worker because of this relationship, or they have exercised undue influence over someone, this will become a disciplinary matter.

8. Working with Family Members

This part of the Policy aims to ensure that Workers do not unfairly benefit from, or suffer unusual detriment, because of a relationship with a family member at work. It is recognised that there are occasions when family members are employed in the same team, or in roles which involve interaction with each other. In such situations, there may be potential for conflicts of interests or allegations of unprofessional behaviour. We wish to ensure that everyone is treated fairly, equitably and without bias and to prevent instances, or allegations of unprofessional behaviour, such as favouritism, nepotism, improper conduct, and breach of confidentiality.

Clear guidance is provided about:

- The contexts to which this part of the Policy applies.
- The procedure for declaring any conflicts of interest in relation to family members.
- Any remedies that may be taken to resolve conflicting interests.

Definitions

‘Close family member’ is defined as a spouse or partner, whether married or un-married and includes same-sex and civil partners; a former spouse or partner; a parent; and a son or daughter.

‘Other family member’ is defined as a brother or sister (including in laws); parent-in-law or grandparent; a son or daughter-in-law, grandchildren; and an aunt, uncle, niece, nephew, or cousin.

Stepfamily members will be included in the definition of family member as if the ‘step’ was not present (example: a stepdaughter will be treated as a ‘close family member’ in the same way as a daughter would be.).

Recruitment

Job applications from family members for advertised vacancies will be treated identically to all other applications for the post. If a family member of a Worker is a candidate, the related Worker must not be involved in any of the recruitment decision making process, i.e., shortlisting of applications, interviewing, making job offers.

If this conflict occurs, a written declaration of the relationship must be made to HR and may lead to the Worker being withdrawn from the recruitment process. However, if this is unavoidable, any decisions must be reviewed independently by a suitable non-family member, in line with the Recruitment and Selection Policy.

If a Worker is involved in the recruitment process where their manager is a family member of a candidate, the reporting relationship must be declared to the recruitment panel.

If the employment of a candidate to a position would cause, or lead to a clear conflict of interest or other breach of this Policy, consideration must be given to whether or not there is justification to not appoint the candidate to the position but to consider them for other positions where the conflict/ issue did not arise.

(Example: If the employment of a candidate meant they would be directly line managed by a member of their family, either 'close' or 'other', this could cause a conflict of interest. Similarly, if a 'close family member' worked in the same team and reported to the same line manager, this could also cause a conflict of interest.)

Employment

Declaration of Relationships - Workers are required to provide a written declaration of working with a family member or a relationship that develops during your employment that could cause or lead to a conflict of interest. This declaration must be made to your manager who will consult HR to undertake a review of responsibilities and line management arrangements.

Line Management - If a family relationship exists, or a relationship develops during employment, alternative management arrangements may be put in place. This may include changing reporting relationships, or potentially changing location or team.

Decisions regarding employment, or employee matters, must not be taken by family members. This includes conducting HR processes e.g., supervision, appraisals, disciplinary and grievances, training and development, promotion, or decisions on pay.

The manager of any 'family members' working closely together will need to give appropriate guidance regarding boundaries and behaviour to ensure this does not give rise to problems within the team, or with their management.

Resolving Conflicts of Interests - If a Worker feels they have been placed in a difficult situation because they are required to work with a family member, or because of a colleague working with a family member, they should raise the issue with their manager. If this is not appropriate, it should be raised with HR.

If a Worker wishes to complain about favouritism, nepotism, or unfair practice they should raise this informally with their manager in the first instance. If this does not resolve the issue, a complaint may be raised under the Grievance Procedure.

Confidentiality - There may be occasions when a Worker has access to confidential information regarding a family member. Managers should make every effort to avoid such a situation.

Bringing Dependants into the Workplace

Workers are responsible for ensuring adequate childcare/care arrangements are in place for their dependants whilst at work. If a Worker is a parent or carer, they may, with prior agreement from their manager, bring their dependant(s) into the workplace for a brief visit provided there are no health and safety risks. It is the Worker's responsibility to look after the welfare of their dependant(s) and to minimise disruption to colleagues' work.

Workers are not permitted to bring any dependant into the workplace with the intention of continuing their normal work.

Work Experience and Volunteering

TMP does not normally offer work experience to anyone under the age of 18. We cannot offer job shadowing, student placements or volunteer opportunities to a Worker's family member. All applications must be made through the relevant recruitment procedure as set out in the Volunteering Policy.

9. General Standards of Conduct

Car Parking

Car parking on site cannot be guaranteed. Workers are required to park safely, legally and with consideration to others. Any vehicle is left at the owner's risk, and TMP cannot accept any liability for damage to cars. Workers may not abandon or store their vehicle on our site. Workers are required to register their car, each day, at Reception if they are parked on site.

Language

Workers are required to converse in English whilst undertaking their duties at work. This helps to ensure health and safety procedures are met and ease of communication between Workers.

Site Security & Safety

Workers are required to always ensure site security and safety. If they are the last to leave the site, they must ensure, as far as practicable and reasonable, that it is impossible for anyone without authorisation to gain access. Site safety is paramount, and they you must follow the relevant health and safety provisions in this respect.

Company Property

Workers must not remove organisational property from the site unless prior authority is given by their manager. All company property must be treated with respect and looked after. This includes (but is not limited to): office materials, buildings, equipment, and contents.

Personal Property

Any personal property such as jewellery, cash, credit cards, clothes, cars, motorbikes, or bicycles etc. left on site is done so entirely at a Worker's own risk. TMP does not accept liability for loss or damage to any personal property whatsoever. Workers are strongly advised not to leave any valuables unattended, either on site or in their own car.

Wastage

Workers must ensure the minimum amount of wastage occurs. This includes (but is not limited to): time, utilities (e.g., water and power) and office materials.