

Catch22 Policy

Code of Conduct

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>People Team</i>
Queries to:	<i>People Director</i>
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Document Version Control & Changes

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<i>1.0</i>	<i>01/03/2022</i>	<i>People Team</i>	<i>Policy updated</i>
<i>2.0</i>	<i>01/04/2024</i>	<i>People Team</i>	<i>Policy updated</i>

1. Summary

This policy, along with any codes of practice of professional bodies you belong to:

- describes what conduct we require of you while working with Catch22;
- covers all Catch22 employees, other workers (including volunteers and trustees), and those who represent the organisation in an official capacity;
- looks at confidentiality; relationships with service users, other staff and contractors; gifts and hospitality; serious professional misconduct; dress code; secondary employment; health and safety; email and acceptable use of IT; and alcohol.

2. What is the policy about?

This policy aims to ensure that you know what conduct we require of you while working with Catch22, so protecting you and helping you feel more confident about what you can and cannot do. This policy sets out the standard of behaviour we expect as an organisation. It is

in addition to the codes of practice of any professional bodies you belong to, with which you must also comply.

Our policy is not exhaustive, so circumstances may arise where you need to consider what conduct we would expect. The primary consideration must be that because we work with vulnerable client groups, our agents and representatives must always act in a way that promotes trust and confidence and shows respect and consideration for others in line with our organisational values of compassion, collaboration, curiosity and empowering people to be the best they can.

Anyone undertaking business on behalf of Catch22, must not behave in a way that adversely affects the Charity or conduct themselves in a way that is not in line with this policy. If in doubt about the proper course of action, always seek advice from your line manager, Assistant Director, Director or a member of the Executive Team.

3. Who is the policy for?

Our policy covers all:

- Catch22 employees, including our associated employers', secondees, and contractors
- other workers (including volunteers and trustees)
- those who represent the organisation in an official capacity

4. How does Code of Conduct work?

4.1 Expectations of employees

4.1.1 Confidentiality

You must treat all information or knowledge obtained as a result of working at Catch22 as confidential, unless it is formally made public. This means you must not disclose it to anyone, except another employee, and only then for legitimate purposes. Information obtained in the course of your association in any capacity with Catch22 must not be used for personal gain or benefit, nor should you pass it on to others who might use it in such a way. This is covered by the Data Protection Act 2018 and General Data Protection Regulations 2018, and the Freedom of Information Act 2000. All employees are expected to familiarise themselves with Catch22's Confidentiality and Data Protection Policies and comply with these.

4.1.2. Personal information

Operational staff have access to sensitive personal data concerning service users, while support staff (e.g., those who work in Finance and the People Team (HR)), have access to sensitive data about staff and volunteers.

Under no circumstance must confidentiality around personal information be compromised and if you have access to such data due to the role you carry out, you are required to make yourself aware of the Catch22 Data Protection Policy and related guidance and how it affects your treatment of sensitive and personal data.

4.2. Professional boundaries

4.2.1. Relationships with service users

You must not:

- discuss service users or staff with other service users
- have inappropriate or sexual relationships or become emotionally involved with service users (this would be a breach of your legal duty of care and may lead to a criminal prosecution)
- enter into any other relationship with service users that is likely to stop you maintaining a proper professional relationship with them
- accept responsibility for, or impose any direct control over, managing service users' finances
- Staff should work within professional boundaries to keep all people safe. This means that staff should pass any information of unlawful and high-risk behaviour (including the carrying of weapons) to the relevant agency as failure to do so could be viewed as collusion and not in line with Catch22 core values to safeguard children, young people and vulnerable adults
- invite service users to your home
- give out your home address or telephone number to service users, or as set out below have service users as friends on social networking internet sites
- You must avoid using social media communications in a way that might breach any of our policies, any of our expressed or implied contractual obligations, legislation or regulatory requirements. You must avoid using social media communications that might be misconstrued in a way that could damage the Charity's reputation of Catch22. This maybe via images, wording or any other content that is posted online either via your own personal accounts or the Charity media accounts.
- buy alcohol, cigarettes, tobacco or lighters for service users.

- You must maintain physical boundaries using the training and associated policies provided in relation to your work.

To maintain clear and effective working relationships with the people you support, you must:

- not meet them outside work in a social setting that is not related to work purposes. If such meetings do occur, behave as you would at work, tell a senior colleague, and ensure the incident is recorded in the service user's contact sheet/records
- not buy goods from, or paying for the services of, service users or their friends
- avoid accepting money or personal gifts from service users. As refusing a personal gift may cause offence, do so graciously. A low-value collective gift to staff, such as a bunch of grapes, is acceptable if intended as a courtesy or sign of appreciation, but gracefully discourage even these kinds of gifts
- not give personal money or personal gifts to individual service users
- not borrow money from, or lend money to, service users
- make it clear that you may not be willing to meet and talk to service users if they appear under the influence of any substance.

In such circumstances, you need to make a professional judgement based on a risk assessment on whether intervention is appropriate

- tell your line manager and colleagues immediately if you have any previous knowledge of service users new to the service
- ensure, if you disclose any personal information about yourself to service users, that it is right, necessary and helpful to them to do so, and record this
- avoid working with service users while you are on sick or annual leave
- to reiterate above, not accept service users as 'friends' on social networking sites, or use such sites to comment negatively on Catch22 policy or practice (see *Social Media Policy*)

If you are anxious about the nature of your working relationship with service users, or uncertain whether a particular course of action is appropriate, consult your line manager as soon as possible. You can also talk about your working relationship with service users at team meetings, and in supervision meetings.

If you live and work in the same community, you may well be part of extended social networks that include service users. In such circumstances, extreme vigilance is needed to maintain appropriate professional boundaries, protecting service users, staff and Catch22's reputation. It is the Service Manager's (or equivalent level manager) responsibility to agree appropriate

management arrangements, guidelines and practical solutions to ensure that appropriate standards of professional conduct are maintained and boundaries managed. These arrangements must be:

- continually reviewed through supervision meetings
- formally reviewed every three months
- copied to the relevant Head of Service and operational director, if the arrangements fall outside this policy

All employees are required to familiarise themselves with Catch22s safeguarding policies, undertake the appropriate training and comply with the policy and practice of Safeguarding within the Charity. Managers must be familiar with the terms of the recruitment policy and relevant pre employment checks and ensure that they comply fully with it.

4.2.2. Relationships with other staff

Close personal relationships between our staff members will sometimes occur. It is very important that such a relationship does not bring advantage to either party or compromise line management or give the impression that advantage or disadvantage may be gained by the relationship.

Whilst not detracting from the principles of the Catch 22 Employee Referral Scheme, you must not be involved in deciding whether to recruit a friend, family member or associate who applies for a job and Directors/Head of function, must formally approve any arrangements which may give rise to a perception of a conflict of interest and take steps to manage those perceptions (see Gifts and Conflicts of Interest Policy). Family members and couples in relationships are not permitted to work beside one another in a supervisory, line management relationship.

- Failure to disclose such a relationship and/or the potential for an inappropriate reporting relationship to be put in place, will lead to disciplinary action.

Supervisory or reporting relationships include both direct, and indirect supervisory responsibility between individuals or an assignment on an ongoing basis. Personal and family relationships in these circumstances can not only compromise (or may be perceived as compromising) objectivity in such matters as contribution review, acting up, promotion and work assignments, but they can also create difficulties in maintaining a professional work climate, evaluations, promotions, and work assignments.

Close family relationships are defined as parental, and sibling relationships, and other members of the family group with whom individuals have a close bond and/or would be perceived as having a close bond. This is likely to include extended family members such as nephews, nieces, cousins etc.

It is the responsibility of those involved to approach their line manager so that appropriate action can, if necessary, be taken. Line managers will then discuss with the parties involved the best way forward. Where there is a concern, this will normally involve re-assignment of line management responsibility in an alternative appropriate manner or redeployment to an alternative post.

If a family relationship (other than parental or sibling) exists but is not considered close by the parties, the full circumstances must be disclosed to the relevant Director who will decide whether the reporting relationship can continue.

Applications for jobs that involve one member of a couple reporting to the other one or to a family member reporting to another family member will not be considered.

4.2.3. Relationships with contractors

You must declare all relationships of a business or private nature with existing or potential contractors or consultants to the appropriate manager. You must not show any special favour to businesses run by friends, partners or relatives.

4.2.4. Gifts and hospitality

To avoid a conflict of interest, the appearance of a conflict of interest, or the need for our employees to examine the ethics of acceptance, Catch22, and its employees do not accept gifts from vendors, suppliers, customers, potential employees, potential vendors or suppliers, or any other individual or organization, under any circumstances.

The exception to this applies to gifts offered by service users where staff should avoid accepting gifts or hospitality of more than nominal value, as this may be perceived as placing an individual under an obligation. Situations may arise where refusal of a small gift from a service user may damage the relationship with the service worker. Advice from the Line Manager should be sought in order to clarify the propriety of any such case. If the decision is that a gift can be accepted then it should be recorded on the file of the service user concerned, and a note of thanks should be sent.

Catch22 requires that all employees demonstrate our organisation's commitment to treating all people and organisations, with whom we come into contact or conduct business, impartially. Catch22 employees demonstrate the highest standards of ethics and conduct.

Employees must practice and demonstrate equal treatment, unbiased professionalism, and non-discriminatory actions in relation to all vendors, suppliers, customers, employees, potential employees, potential vendors or suppliers, and any other individual or organisation.

Hospitality must not be accepted if it could be seen as a way of exerting improper influence over the organisation and a note of any hospitality that is accepted (aside from small items such as occasional soft drinks) must be made and included in notes of Supervision. The local service should keep a record of any gifts and hospitality received, apart from inexpensive items such as working meals at office locations, or free calendars.

In respect of the giving of gifts or provision of hospitality to others reference must be made to Catch22's Bribery Policy (as these may fall under the scope of the Bribery Act 2010) and Conflicts of Interest policies which are essential reading for all. No gifts of significant monetary value are to be given or offered to other people or organisations. This does not apply to such things as birthday or Christmas presents to service users which are given in line with agreed local policy and practice (this expressly includes gifts given in a private capacity). These will be dealt with through the service's normal procedures and practices on such matters.

4.3. Serious professional misconduct

Your behaviour must be above reproach and you must act at all times with honesty and integrity. We will view as serious and be likely to treat as a disciplinary matter any of the following, which is not an exhaustive list:

- theft, abuse or misuse of our property, resources or policies
- falsification of records or other papers for personal gain
- encouraging others to be dishonest (including failing to report suspected dishonesty)
- failing to declare to your director any convictions, cautions, prosecutions, pending prosecutions or ongoing police enquiries
- failure to supply on request an original DBS certificate where your DBS check status has changed or when the manager is informed that a new DBS check has the outcome of Criminal Information Disclosed.
- any misuse of our email, internet or other computer facilities to access, create or circulate offensive material, or any material that may damage our reputation

- failing to comply with our policies, unless you are new to a role and the failure does not relate to generally understood professional standards, practice or common sense
- failing to report any actual or suspected breach of policies (see *Catch22 policy: Whistle-blowing*)
- Use of inappropriate language that may bring about harm to colleagues and or the people we support.
- Physical, emotional or psychological harm to service users and or colleagues.

4.4 Our Commitment to Equality, Diversity and Inclusion

Catch22 is a diverse organisation and recognises that there is strength in diversity of thought and experience and perspectives. As an organisation we are committed to listening, collaborating and empowering each other to respect our colleagues and the people we support.

It is important that we treat all our people (service users, colleagues and other stakeholders) with dignity and respect and in accordance with the law and Catch22 policies.

We do not tolerate physical harassment, bullying or disrespectful behaviour towards our service users, colleagues or stakeholders and expect all those that associate with Catch22 to treat people with respect and compassion. Working in collaboration to ensure Catch22 can deliver high quality, safe and impactful services to the people we support. In the event that this standard is not upheld, you are expected to report concerns to your manager or via using the I have a concern process.

4.5 Maintaining safe professional practice

Catch22 is committed to developing its people. All staff are set out with a mandatory training, and it is compulsory that training is attended at the set intervals.

4.5.1 Dress code

It is not possible or desirable to prescribe a detailed dress code. However, for the sake of safety and service effectiveness, you must dress appropriately, taking into account:

- the environment
- clients or partners worked with
- racial, religious and ethnic sensitivities.

If a manager of Catch22 deems that your clothing is inappropriate for the workplace, you may have to go home and change, and make up the time lost.

4.5.2 Secondary employment

Secondary employment, public service and volunteering may conflict with the interests of Catch22. Before committing to any of these, you must therefore discuss the possibility with your line manager. Before you start such activities, you must have formal written permission from Catch22 management.

4.5.3. Health and safety

All staff have a duty of care regarding their own and others' health and safety. You must report any unsafe practices to your manager, and ensure you are familiar with the relevant Catch22 policies. In particular, you must read in full, and be familiar with, all health and safety policies and procedures which have a direct bearing on your work.

4.5.4 Drugs / Alcohol / Substance Misuse

Catch22 is committed to providing a safe, healthy, and productive workplace for all our people. Drinking alcohol or misusing other substances during working time is not permitted (this includes extended working time eg on residential weekends). This applies to everybody who works on our behalf whether they are having direct contact with the people we work with or not - and equally applies if you work from home. It also applies if you are working off site, on a residential with service users on residential weekends or if you are training in the evening. The basic principle is that you must not drink alcohol while responsible for the care and support of our service users.

Consuming alcohol during breaks at work or immediately before work can impair judgement and performance, present a poor image, and be upsetting for colleagues and service users. You should therefore not consume alcohol or other substances during breaks.

To this end all individuals representing Catch22 are prohibited from:

- Reporting to work under the influence of drugs, alcohol, or any substance that could impair job performance or safety. (This includes any substances that were taken prior to working hours and still has an impact on the individual during the working day).

- Using, possessing, distributing, or selling illegal drugs or controlled substances on company premises.
- Misusing prescription drugs in a manner that impairs work performance or safety.

Exceptions

Drinking a modest amount of alcohol during work hours is permitted in exceptional, celebratory circumstances and where prior approval has been given by the Service Manager/Head of Function or above. Examples of a celebratory event could be a Christmas event or retirement party. Consumption of alcohol in these circumstances however is not allowed where you will go on to work with service users or meet with stakeholders not associated with the event on the same day.

Catch22 services encompass a wide range of service users. Any decision to have alcohol at an event organised in partnership with funders, sponsors or other third parties must take the following into account: -

- i. The age of the service users – alcohol must never be served at an event for under 18s
- ii. The nature of the service being delivered
- iii. The vulnerability of the service users
- iv. Any individual risk assessments that identify that the serving of alcohol may be an issue
- v. Any potential reputational impact that may occur as a consequence of alcohol being served

Any activity must be fully risk assessed and mitigation offered to address any identified risks. It must be authorised by an Assistant Director / Director.

If an individual uses prescribed medication that may affect their ability to perform their duties safely, they must report this to their manager or the people services team. Confidentiality will be maintained, and accommodations will be considered on a case-by-case basis.

Catch22 encourages employees struggling with substance misuse to seek help or to refer to the resources and support made available, including:

- Employee Assistance Programs (EAP)

- Referrals to counselling or rehabilitation services
- Flexible scheduling for treatment and recovery

To uphold this policy, in certain circumstances, Catch22 reserves the right to conduct drug and alcohol testing were permitted by law.

4.8. Use of ICT Systems and Equipment

Catch22's "IT Acceptable Use" policy details the way in which our IT systems may and may not be used. **It is essential reading for everyone using our IT systems.** Our IT- Secure Use and our Data Management and Protection Policies are also **essential reading for everyone.** There are other policies relating to the procurement, licensing and disposal of IT systems, services, equipment and software. The key point in all these policies is that staff must inform the ICT Department before taking any action on these issues. All staff members need to be aware of the existence of these policies and to refer to them as the situation arises.

4.10. Work-related events

From time to time there may be opportunities for staff to attend social events connected with the workplace outside of normal working hours, e.g. staying in a hotel while attending a training course. In such cases it is important to remember that you are still representing Catch22 and that the social event is considered to be an extension of the workplace, accordingly, the usual code of conduct applies in these circumstances. It is also important that all staff participating should enjoy work-related events in an atmosphere of conviviality without fear of being made to feel uncomfortable by another employee's conduct. All staff must adhere to the following principles whether work-related events are on Catch22 premises or not:

- Any alcohol consumption by employees at work-related events, irrespective of whether Catch22 provides or pays for drinks, must be in moderation. (please see the section above for further guidance).
- Employees must not behave in any way that could be perceived to bring Catch22's name into disrepute.
- The Catch22 policy on bullying and harassment applies to work-related events and employees should not say anything including swearing or use of intemperate language or do anything that could be reasonably expected to offend, intimidate, embarrass or upset any other person, whether intended as a joke or not.
- Employees must never use illegal drugs, including cannabis at any work-related events.

Any breach of the above principles will render the employee liable to disciplinary action, up to and including summary dismissal.

5. Related policies

- Anti-Bribery Policy
- Data Protection Policy
- Disciplinary Policy
- Confidentiality Policy
- ICT Policy
- Safeguarding (Protection of Children and Adults at Risk) Policy
- Social Media Policy
- Financial Policies and Procedures
- Gifts and Conflict of Interest
- DBS Checks Policy
- DBS Barring and Referrals Policy
- Employee Volunteering
- Annual Leave and Special Leave Policy
- Recruitment and Selection Policy
- Sole Trader Policy
- Dealing with Bullying and Harassment
- Equality and Diversity policies
- Health and Safety Policy and Procedure
- Code of Practice for Use of Email and Internet
- Whistleblowing Policy

6. Appendices

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Code of Conduct Policy
EIA completed by:	Christina Duru, Chief People Officer
Date of assessment:	March 2022

Assessment approved by:

n/a

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes

This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	

Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.