

Cultural Code

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Staff Cultural Code

Purpose

Our culture is central to how we work and this Cultural Code is intended to describe that culture through promoting good practice and maintaining standards of behaviour and conduct within the company alongside existing company policies and procedures and the staff handbook. The Cultural Code applies to all staff and associate workforce, and all are trusted to comply with the spirit of the code and culture of the company.

The document outlines standards that members of staff are trusted to adhere to while working with the company. Staff should reflect on their behaviour and question whether they are in line with our values of::

- *Togetherness*
- *Integrity*
- *Excellence*
- *Passion*

Staff are trusted to behave in a way that demonstrates the above values and adhering to the company guidelines, including being professional at all times, treating colleagues and partners with respect and taking responsibility for their own behaviour and actions.

It is a staff's responsibility to familiarise themselves with, and adhere to, all of the company's policies and procedures. A positive working environment can only be maintained through a positive and collective approach. All members of the staff are expected to read, confirm their understanding, and abide by the Cultural Code of Conduct. Failure to comply with the standards of performance and behaviour outlined in this document may result in disciplinary action in accordance with our disciplinary procedure.

This document provides a framework for staff to work with. However, some situations may require case-by-case examination.

Standards

Staff are trusted to:

- Comply with our company policies and procedures.
- Act in a way that mirrors our vision, mission, and values.
- Take personal responsibility for, and pride in, their environment (which may include office, home, virtual and any tutoring/assessing environments) and any company property. Please also refer to the Clean Desk & Clear Screen Policy.
- Maintain an awareness of company communication through emails, newsletters, and other forms of media communication.
- Avoid any sort of behaviour that is likely to bring the company into disrepute inside and outside work time.
- Be open, honest and challenge positively.
- Demonstrate respectful, considerate, and professional behaviour to all colleagues, learners and partners at all times.
- Ensure relationships with individuals are never of a kind that could compromise your professional responsibilities.
- Take responsibility for personal and professional development.
- Ensure that the needs of learners and external partners are prioritised and as far as reasonably possible, are met to their satisfaction.
- Always work to support individual learning, achievement, and development.
- Promote high standards of learner behaviour.
- Put the interests of the company above their own service area interests.
- Respect confidentiality and the right to dignity and privacy.
- Meet deadlines whenever possible and negotiate new deadlines if there are legitimate reasons why they cannot be met.
- Reply to direct forms of communication promptly even if to acknowledge and give a date for a full response.
- Share relevant information with colleagues.
- When it is appropriate, deal with issues face to face, meeting in person or on virtual meeting software or by telephone rather than by email.

- Communicate ideas and make suggestions for improvements, exploring solutions to problems and making positive contributions.
- Bring concerns to the attention of relevant managers.
- Read and familiarise themselves with the Safeguarding and Prevent Policy, Strategy and Procedures, ensuring that they are able to recognise, respond, report, record and refer any concerns about safeguarding or prevent with the Designated Safeguarding Lead (Katherine Percival), or in her absence to the Deputy Designated Safeguarding Lead (Simon Kirkland).

Mobile Phones

Staff will be supplied with mobile phones if their work requires significant contact with customers. If you are given a mobile phone, you should follow the following guidance.

1. Your phone should be charged and ready for use at the start of the day.
2. The phone should be on during working hours.
3. It should be put on silent (not off) during meetings.
4. The answerphone message should be "Thank you for calling XX (insert your name) at Sport Structures. I am afraid I am currently unavailable so please leave a message and I will return your call as soon as possible. Alternatively, you can email me at (Insert your email address)"
5. Answer phone should be checked every day.
6. Voice message should be answered within one working day.

Please note, the company mobile phone is the property of the company and should be looked after with care. Any damage should be reported immediately to your Line Manager, along with any faults (i.e., not charging, etc.).

Attendance and timekeeping

We trust our staff to manage their time appropriately. Staff attendance is expected to be punctual. If you are running late for a work event such as a meeting, individuals should be informed in advance or as soon as possible (i.e., the meeting host or your Line Manager, where appropriate).

Instances of lateness should be explained by the member of staff concerned.

It is the responsibility of management to approve any variations (including any short-term variations) to an individual's normal hours of work. Individuals should not vary their normal hours of work without prior management approval.

Alcohol and substance misuse

Staff are prohibited of working under the influence of any substance, including alcohol, illegal drugs and/or solvents. We provide staff with a smoke-free environment for work and encourage staff to work in a such environment. Smoking is only permitted in designated external areas at the office.

Staff who have been prescribed medication by a healthcare professional must inform their Line Manager/HR Manager and Sport Structures contact immediately if that medication has, or could, have an adverse effect on their ability to carry out duties.

In social situations, where staff are attending events (both internal and external), staff should always remain professional.

Standards of dress

Staff are encouraged to dress in a way which is professionally appropriate and presentable for the role they are undertaking. For salaried staff, attire should be business casual. For staff operating in the office, we have 'dress down Fridays' when casual clothing is acceptable unless you have face-to-face meetings with external partners. Denim attire should be free from rips and holes.

Disclosure and Barring Service (Suitability to work with children and vulnerable adults)

Roles are assessed in order to decide if a DBS disclosure or check is required and if it is, what level of disclosure is required. DBS checks are undertaken to ensure that the company upholds its duty of care to protect vulnerable groups who access company services. Any information disclosed on the DBS certificate will be risk assessed.

In the event of failure to cooperate with a reasonable request on the part of the company to obtain a DBS check, this may result in withdrawal of the offer of employment as the offer is conditional to successfully completed DBS check. DBS tracking is monitored through the Staff Central Record System.

Criminal charges, cautions and convictions

All staff have an obligation to inform the company if they are the subject of criminal investigations, charge, caution, warning or conviction and failure to do so may result in disciplinary action. However, a member of staff will not face disciplinary action solely because they are the subject of criminal investigations, charge, caution, warning, or conviction. The company will try to determine whether the conduct warrants disciplinary action because of its effect on the staff member's ability or

suitability to undertake their job role and/or on the reputation of the company. In such circumstances, the facts of the matter should be investigated and if disciplinary action is considered appropriate, the procedure outlined in this document should be followed. The company will not usually wait for the outcome of any prosecution before deciding what action, if any, to take.

Safeguarding, Prevent and allegations against staff

Any allegations of abuse or safeguarding concerns about the welfare of a child or adult, must be referred to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead **as soon as possible**. This also applies to safeguarding concerns which relate to Prevent (where you are concerned an individual is at risk from radicalisation). All staff must read and demonstrate their understanding of the Safeguarding and Prevent Policy, Strategy and Procedures document, through completion of the safeguarding quiz.

Where staff have any safeguarding concerns about another member of staff these concerns must be reported immediately to the DSL or Deputy DSL. Please refer to the Safeguarding and Prevent Policy, Strategy and Procedures.

Personal relationships – learners both under and over 18

Relationships between members of staff and learners are discouraged and this is clearly explained in the safeguarding procedures.

Personal relationships - between staff

Personal relationships between staff are not discouraged or against any of this code. However, if you perceive that a personal relationship you have with a colleague may give rise to a professional conflict/compromise you should bring this to the attention of your Line Manager/HR Manager. This applies equally to relationships that existed prior to employment and to relationships that develop whilst at the company. Such disclosures must be treated with respect, dignity and in confidence, however it may be necessary for the Line Manager to discuss with their Line Manager or HR Manager, but this will be on a strictly privileged basis and will be discussed with the member of staff in the first instance. It may be necessary for working arrangements to be amended in order to maintain the integrity of both parties and the organisation. The Line Manager will speak to the Directors to identify the necessary approach.

Personal relationships – partner or service provider.

If you perceive that a personal relationship you have with a partner or service provider may give rise to a professional conflict/compromise, you should bring this to the attention of your Line Manager/ HR Manager or the DSL/Deputy DSL. Such

disclosures must be treated with respect, dignity and in confidence. If you are unsure about what action to take or how you should respond to any situation you must immediately contact one of the members of staff listed above.

Health and safety

We are committed to promoting and implementing all relevant health and safety legislation and recognises that the highest priority must be given to safe methods of work at all times. Health and Safety is the responsibility of all staff and associates working for Sport Structures, regardless of position.

Staff must familiarise themselves with the company's Health and Safety Policy and must ensure that all health and safety standards are met in accordance with that policy. Staff must not, under any circumstances, behave in a way which could endanger their own health and safety or the health and safety of others. Any breach of the company's Health and Safety Policy will be viewed seriously and may constitute gross misconduct in accordance with the company's disciplinary procedure.

Damage to property

Anyone suspected of, or caught, causing deliberate damage to company property, or third-party property within any company or third-party premises will be subject to disciplinary action in accordance with the company's disciplinary procedure.

Equality and diversity

We are committed to ensuring equality of opportunity for its staff and learners alike. All staff have an individual responsibility to uphold and apply in practice the company's Equality and Diversity Policy and are strongly encouraged to conduct themselves in a manner consistent with that scheme and with relevant legislation. Discrimination and prejudice will not be tolerated, and such conduct may result in disciplinary action being taken in accordance with the company's disciplinary procedure. For more information refer to our Equality and Diversity policy.

Information technology

All staff have an individual responsibility to uphold and apply in practice the company's policies relating to IT, Data Protection, Privacy, E-Safety and Social Media. Breaches of these policies will be addressed in accordance with the disciplinary procedure. Staff shall not use the internet or email for the following:

- to knowingly break the law.
- to fail to comply with the relevant, existing policies.

- to compromise the integrity of any network or system.
- to access, display or transmit any kind of sexually explicit material or any offensive or discriminatory material of any kind.
- to download software or play games.
- to bet or gamble.
- to disclose private or confidential information.
- to access inappropriate and harmful extremist content online.

The same rules apply if members of staff are using personal IT equipment for undertaking company related business.

Bullying and harassment

We recognise that all members of staff and its partners have the right to be treated with consideration, respect and dignity, and is committed to creating and maintaining an environment free from discrimination, harassment, bullying, intimidation and victimisation. Please refer to the Anti-Harassment and Bullying Policy.

To clarify, bullying and/or harassment is verbal, non-verbal, online or physical conduct which is unsolicited or unwelcome and which another individual considers violates their dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Instances of bullying and or harassment at work, or outside work if it has a bearing on the working relationship, is unacceptable and will not be tolerated. Cases of bullying and harassment will be dealt with through the company's disciplinary procedure as appropriate.

Examples of bullying / harassing behaviour could include:

- spreading malicious rumours or insulting someone.
- exclusion or victimisation.
- unfair treatment.
- deliberately undermining a colleague by constant criticism.

Staff working with children should also be aware of the indicators of peer-on-peer (child on child) abuse and be able to respond to concerns. Staff have a responsibility to challenge inappropriate behaviours between peers to avoid a culture of unacceptable behaviour. Please refer to the Safeguarding and Prevent Policy, Strategy and Procedures document along with the Addendum.

Conduct outside of work

We do not seek to dictate how staff conduct themselves in their personal lives outside work. However, unlawful, anti-social or other conduct by staff which may jeopardise organisational reputation or position is discouraged and may be dealt with through the disciplinary procedure on a case-by-case basis.

Freedom of Speech

1. Introduction

This section outlines Sport Structures' commitment to promoting freedom of speech while emphasizing the importance of responsible and respectful communication in our workplace.

2. Principles

Respect for Free Speech: Sport Structures upholds and respects the fundamental democratic principle of freedom of speech, recognizing its importance in fostering innovation, collaboration, and a diversity of perspectives within our organization.

Respect for Others: While we value the right to free speech, we equally value respect for individuals and their dignity. Therefore, all employees are expected to exercise their freedom of speech in a manner that does not harm, discriminate against, or harass others.

3. Responsible Communication

Respectful Communication: Employees are expected to communicate in a manner that is respectful, professional, and considerate of others, whether through verbal, written, or digital means.

Avoidance of Hate Speech and Discrimination: Sport Structures prohibits hate speech, discriminatory language, or harassment based on race, gender, religion, nationality, disability, or any other protected characteristic. Such behaviours are considered unacceptable and will not be tolerated.

Protection from Harassment: Employees have the right to express concerns if they feel that they are being subjected to harassment or discrimination, even if it arises from the exercise of free speech. Sport Structures is committed to Re-addressing such concerns promptly and effectively.

4. Social Media and Online Expression

Personal Responsibility: Employees are responsible for their public statements made on personal social media accounts. When expressing personal opinions on matters related to Sport Structures' employees must make it clear that their views are personal and not representative of the organization's official stance.

Disclosure of Affiliation: If an employee identifies themselves as a member of Sport Structures on personal social media accounts, they should take care not to create the impression that their views represent the organization's official position.

5. Reporting and Resolution

Reporting Violations: Employees are encouraged to report any violations of this Cultural Code, including freedom of speech issues, to their immediate supervisor, HR, or an appropriate authority.

Investigation and Resolution: Sport Structures will conduct impartial investigations into reported violations and will take appropriate action based on the findings.

6. Consequences of Violation

Consequences: Violation of this Cultural Code, including the freedom of speech section, may result in disciplinary actions, such as warnings, suspension, or termination of employment or services, depending on the severity of the violation.

7. Legal Compliance

Legal Compliance: Sport Structures is committed to complying with all relevant laws and regulations governing freedom of speech and expression.

8. Review and Updates

Policy Review: Sport Structures will periodically review and update this Cultural Code, including the freedom of speech section, to ensure alignment with changing legal, societal, and organizational requirements.

Confidentiality

All staff have a personal responsibility to protect and maintain the confidentiality of both, Sport Structures, and partner information. The disclosure of confidential information relating to the company and/or its partners is prohibited, except as authorised or required by the law or in accordance with a member of staff's duties under their contract of employment, when making a protected disclosure under the Public Interest Disclosure Act or sharing information with relevant agencies regarding to Safeguarding and Prevent, where that information may help to protect a child or vulnerable adult.

If staff are unsure as to whether they should disclose information which they consider to be, or might be, confidential, they should seek guidance from their Line Manager or the HR Manager. Please refer to our Privacy Policy, Data Protection Policy, and E-Safety Policy.

Conflict of interest

We encourage staff and associates to volunteer in their personal life and this may lead to potential conflicts with their work. In order to uphold fairness and consistency, members of the staff and associates must disclose any interests and/or relationship(s) - whether direct or indirect - that they have with any person, company or other organisation involved with the company and/or its business and/or activities which may give rise to conflict/compromise.

Staff and associate workforce must not, without the written permission of the Directors undertake any employment or engagement which might interfere with the performance of their duties or conflict with the interests of the company. Please refer to the Conflict-of-Interest Policy for more information.

It is employee's responsibility to declare an interest via our Declaration of Interest Form upon commencing your employment or when the conflict arises.

Gifts and hospitality

We recognise that in our sector it might arise that goods are part of events or activity. Staff must not accept or give any gifts, fees or inducements for any service connected with their employment (including, for the avoidance of doubt, any such gifts received from learners), with the exception of minor gifts, inexpensive marketing materials and cards. Individuals should inform their Line Manager/HR Manager or Sport Structures contact if they are offered any substantial gifts (over the value of £50) or if they require further clarification.

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

Bribery

We prohibit the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual member of staff, board member, agent or other person or body acting on the company's behalf in order to gain any commercial, contractual or regulatory advantage for the company in a way which is unethical or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Media

We have an active marketing approach, and this may lead to media coverage. If you are asked by the media for information relating to Sport Structures activities, you are encouraged to contact one of the Directors prior to releasing any details. This approach ensures that the information we give is consistent and follows corporate guidelines.

Fraud

The reputation of the company is paramount and we have worked hard to build this. To mis-represent any aspect of the company or its requirements to be within the law or compliant with external bodies requirements is completely unacceptable and will instigate action through the company disciplinary process.

Whistleblowing

We encourage staff and partners to raise genuine concerns about malpractice taking place in the company. Please refer to the Whistleblowing Procedure and Malpractice and Maladministration Policy. If you do raise a genuine concern in good faith all reasonable steps will be taken to respect your confidence. Any malicious use of either policy will be treated as a disciplinary matter.