

Code of conduct policy and statement

All commercial organisations with an Annual Turnover of £36 million and above are subject to the Modern Slavery Act 2015 and must report annually on the steps that they have taken during the financial year to ensure that slavery and human trafficking are not taking place in their own business or in their supply chains.

InSync Recruitment Ltd's Statement

Whilst InSync Recruitment Ltd is not subject to the reporting requirements of the Modern Slavery Act 2015, it supports the government's objectives to eradicate modern slavery and human trafficking.

InSync Recruitment Ltd is committed to the highest level of ethical standards and sound governance arrangements, and sets high standards of impartiality, integrity and objectivity in relation to the management of its activities. InSync Recruitment Ltd does not knowingly participate in human trafficking, it does not treat people as slaves and pays the people who work for the organisation a decent living wage. It reserves the right to seek assurances from any organisation with which it trades that the organisation is not participating in any activity that would be in breach of the Modern Slavery Act 2015.

Date 27th Jan
prepared by David Allden and Nick Fletcher
Founders and directors of InSync Recruitment Ltd

Introduction

InSyn Recruitment Ltd expects the highest ethical standards from its employees in carrying out its business. This Code of Conduct (the Code) sets out those standards by which all employees are bound. It provides guidelines on the required behaviour in a wide range of situations, including social events and out of hours activities that directly reflect on InSyn Recruitment Ltd. It also refers to the relevant supporting policies in the Staff Handbook.

It is the responsibility of all employees to familiarise themselves with the details of the Code and its guidance. If any employee has any queries or concern about how they should behave, they should contact David Allden or Nick Fletcher (Directors).

The Code applies to all employees, temporary staff, agents and contractors.

All staff should follow the guidance in this important document.

Signed by both David Allden & Nick Fletcher

The Purpose and Principles of the Code

The Code describes the principles by which InSyn Recruitment Ltd expects its employees to conduct its business. It sets out the required standards of behaviour for its staff in carrying out this business. The Code deals with a wide variety of issues and situations relating to workplace conduct, but it is not intended to be exhaustive.

This Code of Conduct sets out principles by which InSyn Recruitment Ltd is bound. These principles are as follows.

- We comply with laws and regulations.
- We reject bribery and corruption and avoid being compromised by gifts and entertainment.
- We avoid conflicts of interest.
- We respect the confidentiality of personal and corporate information.
- We promote diversity and equality and treat people fairly and with respect.
- We maintain a safe and healthy environment for people to work in and are proactive in managing our responsibilities to the environment.
- We support those who have any suspicions of any misconduct, malpractice, illegal

or unethical behaviour and report their concerns in confidence to the appropriate channels.

These principles are outlined in more detail in the Code below. Several of the principles and standards outlined in the Code are supported by more detailed specific policies in the [Staff Handbook](#). These policies are referred to in the Code.

The handbook can be found on the InSync web site.

Zero Tolerance

While this Code gives guidance to employees in certain situations, there are specific areas where InSync Recruitment Ltd has a policy of zero tolerance. These are:

- unsafe, illegal or unethical working practices
- violence and aggression
- discrimination, bullying and harassment
- bribery and corruption
- retaliation or action against anyone who speaks up and, in good faith, reports a wrongdoing.

Breaches of the Code

This Code of Conduct has been drawn up to provide guidance on conduct for staff of InSync Recruitment Ltd. For the avoidance of doubt, it is not a contractual document and InSync Recruitment Ltd reserves the right to amend it at any time. The Code will be subject to regular review, particularly in the light of new and relevant legislation.

Any breach of the Code will be considered a disciplinary matter, which could result in disciplinary up to and including dismissal.

Code of Conduct: Guidance

The guidance in this Code of Conduct is organised into separate sections.

- Financial probity.
- Data protection and IT.
- Standards of personal behaviour.
- Environment.
- Raising concerns through confidential reporting.

As already mentioned, a number of the principles outlined in this Code are supported by more detailed information found in the Staff Handbook. All employees are required to comply with these policies.

Financial Probity

Compliance with the law

InSync Recruitment Ltd business and employees (and all others to whom this Code applies) must observe UK laws and regulations.

Employees who raise concerns about whether conduct complies with the law and with the Code should immediately bring it to the attention of their manager. It is InSync Recruitment policy that staff who raise concerns in good faith shall not suffer any kind of punishment or retaliation.

Bribery and corruption

InSync Recruitment does not permit, in accordance with the provisions of the Bribery Act 2010, the bribery of any person involved in its business. Employees must not authorise, offer, promise or pay or receive a bribe designed to secure an unlawful advantage. The amount of the bribe is irrelevant.

In some circumstances, excessive hospitality or gifts may be regarded as offering or receiving bribe. An employee should always check with their line manager if in doubt.

Fraud

Fraud is not tolerated in InSync Recruitment Ltd.

Any attempt to secure an unlawful gain will lead to disciplinary action and sanctions up to and including dismissal. A report will also be made to the relevant authority which could lead to prosecution.

InSync Recruitment will always seek to recover loss resulting from fraud.

Conflict of interests

It is important that, where decisions are made which have a significant effect on InSync Recruitment and others, they are taken in a fair and balanced way. Any potential conflicts of interest must be declared so that individuals are not involved in decisions that could be regarded as biased.

Data Protection and IT

Data protection

The General Data Protection Regulation and the Data Protection Act 2018 comprise the data protection regime that applied in the UK from 25 May 2018. This regime supersedes any previous legislation.

InSync Recruitment holds and processes information on its staff and other data subjects for commercial and administrative purposes. It will only collect and handle data for "legitimate interest" and in compliance with the data protection regime above.

For further information, employees should refer to the *Data Protection* policy.

Confidentiality

InSync Recruitment is committed to the maintenance of the highest level of integrity in all its dealings with clients, customers and staff. This extends not only to commercial confidentiality but also to the protection of personal information received in the process of providing a service.

Social media

Employees may use social media for work purposes (such as LinkedIn) or for personal use (for example, Facebook). Employees should not access social media for personal purposes during working hours.

Any use of such social media must be respectful of InSync Recruitment reputation and that of all its staff. Employees must not disclose confidential information when using personal social media.

For further information, employees should refer to the *Social Media* policy. Failure to comply with this policy is a disciplinary offence. It may amount to gross misconduct and could result in summary dismissal.

Standards of Personal Behaviour

Equality, diversity and inclusion

An important core value of InSync Recruitment is the promotion of inclusivity and diversity. It seeks to ensure that the workplace is supportive of its staff and one where individual respect is shown to all members of staff, regardless of age, (dis)ability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, ethnic background, culture, sexual orientation, religion or belief, sex or any other factor. All staff will be supported and encouraged to perform to their potential.

For further information, employees should refer to the *Equal Opportunities* policy.

Bullying and harassment

InSync Recruitment has zero tolerance to bullying and harassment.

Disciplinary action will be taken against inappropriate behaviour that shows lack of respect for

others, or causes people to feel threatened.

For further information, employees should refer to the *Bullying and Harassment* policy.

Conduct outside work

As a general rule, what employees do after working hours and away from the premises is a personal matter. However, InSync Recruitment will become involved in the following circumstances.

- At office parties, drinks events and other work-related social occasions.
- At third-party (that is, clients and customers) occasions where the employee has been invited in their capacity as an employee and representative of InSync Recruitment Ltd.
- At work-related conferences and training courses.
- Where the employee is away on business on behalf of InSync Recruitment.

InSync Recruitment policies will continue to apply at all these events. An employee should not bring InSync Recruitment's name into disrepute. Improper behaviour will lead to investigation and possible disciplinary action, including dismissal and in cases of gross misconduct, a summary dismissal.

For further information, employers should refer to InSync Recruitment *Disciplinary and Grievance Procedures in the hand book*.

Relationships with other members of staff and clients and customers

InSync Recruitment does not concern itself with the private lives of its staff unless they affect its effective operation or its reputation.

Members of staff who are relatives or who have a close personal relationship should not normally have a supervisory, assessing or authorising relationship with each other.

Employees must inform their line manager if they have a close personal relationship with another employee or a client or customer which could be considered by colleagues or other, as impacting on the way they conduct themselves at work.

Criminal offences

For the avoidance of doubt, an employee must inform their manager in writing if they are under investigation for a criminal act (including road traffic offences) or have been arrested in connection with a criminal action. They must also inform their manager in writing if they have been found guilty and convicted of any offence or received a police caution. Failure to disclose this information may be treated as a disciplinary offence.

Furthermore, if an employee commits a criminal offence outside employment, InSync Recruitment will investigate the matter to ascertain whether there is any connection between the offence and the individual's employment. If there is an adverse finding in this respect, this could result in the employee's dismissal under the disciplinary procedure.

Health and safety

InSync Recruitment places a high priority on providing a safe workplace and minimising the risks identified by the Health and Safety at Work Act 1974 and associated legislation.

Effective safety management requires the active involvement of every employee and every employee has a legal duty to look after their own health, safety and welfare and that of those around them.

Employees should refer to InSync Recruitment *Health and Safety* policy for further information.

Environment

InSync Recruitment is committed to preventing, or, at the very least, minimising, any harmful effects it causes to the natural environment. We encourage all employees to conduct their work in accordance with the highest environmental practices and the minimising of waste.

Raising Matters of Concern: Confidential Reporting Procedure

Employees who become aware of activities which they believe, in good faith, are illegal, improper, unethical or otherwise inconsistent with this Code, may report the matter (often known as “whistleblowing”) to InSync Recruitment directors in accordance with the requirements of the Public Interest Disclosure Act 1998.

Any individual who raises such a concern in good faith and in line with InSync Recruitment whistleblowing policy will not suffer any detriment or be penalised in any other way.

For further guidance on the issue and on the procedure, employees should refer to the Organisation’s Whistleblowing Policy.

Written and reviewed 27th January 2020

By David Alden & Nick Fletcher

Founders and Directors of InSync Recruitment Ltd