

# CODE OF CONDUCT FOR NACRO EMPLOYEES

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## Summary

Employees of Nacro and its group of companies are expected to uphold seven principles:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

This code explains what this means in 12 sections:

1. Introduction
2. Principles
3. Responsibility of Nacro as an employer
4. General standards
5. Financial conduct
6. Relationships
7. Tendering and purchasing
8. Employment matters
9. Outside activities
10. Convictions
11. Gifts and hospitality
12. Declaration of interests

If you are in doubt as to what a section means for you please ask your line manager, (in the first instance), a Senior Human Resources Advisor or the Company Secretary/Director of Finance and Resources.

# 1 Introduction

- 1.1 The reputation of Nacro as an open, fair, professional organisation with a high standard of integrity and commitment to service is dependent upon the conduct and behaviour of its staff.
- 1.2 Nacro has other policies and procedures, which are relevant to the conduct of employees and to which reference should be made. These include:-
- Confidentiality
  - Data Protection
  - E-mail and Internet
  - Equality & Diversity
  - Grievance Procedures
  - Misconduct and capability Procedures
  - Dignity at Work
  - Health & Safety
  - Information Technology
  - Whistleblowing
  - The Employment and Education Directorate guidance for staff
- 1.4 The words "staff" & "employees" are used interchangeably in this code. By those words we mean permanent, full and part time and temporary people working for Nacro, sessional workers, volunteers, secondees and placements.  
"Nacro" includes NACRO Community Enterprises Limited and any other organisations of which Nacro is the parent company.
- 1.5 The Code of Conduct forms part of the contract of employment and staff are required to abide by it at all times. Breaches of the Code of Conduct could lead to disciplinary action.

## 2 Principles

Employees are expected to uphold the following principles:

- **Selflessness:** staff take decisions solely in terms of the values and purposes of Nacro, not in order to gain financial or other material benefits for self, family or friends.
- **Integrity:** staff do not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their duties.
- **Objectivity:** employees ensure that in the delivery of services, the appointment of staff or the awarding of contracts, impartiality is ensured and that choices are made on merit alone.
- **Accountability:** staff accept accountability for their decisions and actions to trustees, service users, trainees, residents, the providers of public funds and other stakeholders.
- **Openness:** staff are as open as possible about all decisions and actions taken. Reasons are given for decisions and information is restricted only when individual or commercial confidentiality clearly so demand.
- **Honesty:** employees declare any private interests relating to their duties and take steps to resolve any conflicts arising in a way that is lawful, and protects the reputation and values of Nacro.
- **Leadership:** these principles are promoted and supported by leadership and by example.

## 3 Responsibility of Nacro as an employer

Managers are responsible for ensuring:

- 3.1 that staff reporting to them are aware of this Code of Conduct.
- 3.2 that staff understand Nacro's governance arrangements and particularly the role of the Nacro Board & Council and the NCE Board.
- 3.3 that employees of NCE and those who work with NCE are fully aware of Schedule 1 of the Housing Act 1996 as affecting them, their close relations & any business trading for profit with which they are concerned (the full text of Schedule 1 is included at Appendix A).

## **4 General Standards**

- 4.1 Staff are required to treat everyone with courtesy and respect at all times.
- 4.2 Everyone has the right to be treated with dignity.
- 4.3 From time to time staff will have to deal with difficult people. In such circumstances they should maintain high standards of professionalism and fairness.  
Rudeness, offensiveness, threatening violent or abusive behaviour is not acceptable in any circumstance. If you are subject to unacceptable behaviour, advise your line manager.
- 4.4 Racist, sexist or homophobic behaviour or behaviour which discriminates against or demeans others because of their age, disability or religious beliefs, is not acceptable in any circumstances.
- 4.5 Staff should be reliable and punctual and be able to demonstrate honesty, integrity and fairness. Staff should avoid doing things which might imply a sloppy or uncaring attitude.
- 4.6 Staff are expected to dress appropriately, safely (some jobs require protective clothing) and not in a way that could be taken to show disrespect for those they are working with. (See Dress Code Attached).
- 4.7 Staff should be aware of and work to any service standards which apply to their department.
- 4.8 Alcohol, drugs or substance misuse impairs judgement and staff can put themselves, their work colleagues and members of the public at risk if they undertake their duties whilst under the influence of drink, drugs and dangerous substances. Misuse of any such substance whilst staff are at work, or that affects their work will be treated as a gross misconduct.
- 4.9 Staff should abide by Nacro's Health and Safety procedures at all times.  
Staff have a responsibility to ensure that their conduct does not endanger the health or safety of themselves or other employees, visitors, service users and customers.

## **5 Financial Conduct**

- 5.1 Staff should ensure that current policies, procedures, financial standing orders, internal controls and other regulations are followed at all times. Suggestions for improvement may be discussed with their line manager or with the Internal Auditor and must be passed to the appropriate director or the company secretary for consideration. No changes to national or local financial procedures etc may be made without Board approval.
- 5.2 Staff are expected to take reasonable measures to protect the charity's property and assets from theft, damage waste or misuse. Staff must ensure that they use funds & resources entrusted to them for the purpose intended, and in a responsible manner.

- 5.3 Staff should only use the Charity's monies and assets for their intended and lawful purpose. Staff should strive to ensure value for money for the Charity, its residents, trainees and other service users.
- 5.4 Staff should be aware that it is a serious criminal and disciplinary offence to corruptly receive or give any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything or showing favour to any person or organisation.
- 5.5 If staff are aware of potentially corrupt or fraudulent activities by other employees they have a duty to report this to their Director, the Company Secretary or a Senior Human Resources Advisor. (To do something corruptly, in this context, means to do it dishonestly).

See Section 11 on Gifts and Hospitality.

- 5.6 Staff should not do anything which would risk the integrity of the Charity's Information Technology systems. This would include the use of unauthorised or unlicensed software on the Charity's system.

All software or disks incorporated onto the Charity's system must be virus checked and approved by the IT Department. Staff must not copy software products licensed to Nacro.

## **6 Relationships**

- 6.1 Staff are responsible to the trustees (the Council of Nacro or the Board of NCE) through the line management structure leading to the management Board and the Chief Executive. If their work brings staff into contact with trustees, mutual respect between them is essential to the good running of the organisation. Close personal intimacy between staff & individual trustees could be prejudicial to this relationship and should be avoided.
- 6.2 Staff should not use informal channels to influence trustees on matters of Council or Board business.
- 6.3 If staff are involved in the delivery of services, they should always remember their responsibilities to service users & the community & ensure courteous, efficient & impartial service delivery to all groups & individuals. Everyone must be treated with respect.
- 6.4 Staff should always give their name & job title to any service user or member of the public with whom they have contact.
- 6.5 Staff must never allow any personal relationship to conflict with the duties of their employment, or with the best interests of a service user. They must never allow themselves to be compromised by or take advantage of their relationship with a service user.
- 6.6 Many of our service users are vulnerable and staff can be in a position of power over them, even when they are over the age of consent. Any form of sexual

relationship between a current member of staff and a **current** service user is strictly prohibited and will be regarded as gross misconduct.

***For example***

*Sexual advances or sexual innuendo are unacceptable in relationships between staff & service users. All staff should give due attention to decency and privacy.*

*Other examples of relationships with service users that should be avoided are:*

- *sexual relationships between a member of staff and a service user.*
- *the making of personal loans to or borrowing goods or money from them*
- *gambling*
- *receiving money without authority*
- *asking them to carry out paid or unpaid private work or services*
- *purchasing or selling from or to them*
- *making gifts or accepting gifts from individuals*
- *conducting private correspondence or giving them home addresses or contact numbers*
- *donating personal items to a project without first consulting the project manager & the staff member's line manager*

- 6.7 Any member of staff who feels compromised in the course of their dealings with a service user must inform their line manager without delay.
- 6.8 Staff must not invite or influence a service user to make a will or trust under which they are named as executor, trustee or beneficiary. If handling service users' money or valuables they must take great care, including the receipting of every transaction.
- 6.9 If staff are involved in the award of tenancies or grants, or the allocation of housing or the appointment of jobs for trainees or other service users they must ensure absolute impartiality in the decisions made & avoid any conflict of interest.

**Relationships with the Press and Media**

- 6.10 Staff must not, other than in accordance with Nacro media office guidelines, pass or distribute to the press or media any information or materials relating to Nacro. Enquiries must be forwarded to the Communications department.
- 6.11 Similarly, staff should not write letters to the press or write media articles about Nacro and its activities, or write letters or articles in their capacity as a Nacro employee without consultation with the Head of Communications or Media Office.
- 6.12 Staff must not make comments or statements to the press unless they have been specifically authorised to make such statements. In other circumstances, if approached by the media staff should take details about the enquiry and contact the Media Office or Head of Communications for advice as soon as possible.

## **7 Tendering and Purchasing**

- 7.1 Staff involved in buying goods or services on behalf of the Charity should ensure that:
- decisions provide the best value for money;
  - decisions are taken objectively and without favour to one supplier or contractor;
  - competition between contractors/suppliers is fair and open;
  - appropriate procedures are followed, e.g., using an approved suppliers' list or following tendering procedures.
- 7.2 Staff should avoid using Nacro's contractors and suppliers for private purposes. Where this is unavoidable they should not get a preferential service as a result of their employment with the Charity. Consent should be sought, via their line manager, or their Director before using a supplier or contractor in any circumstances where there could be a possibility of undue influence or preferential treatment.

## **8 Employment Matters**

- 8.1 In order to avoid any possible accusation of bias, staff should not be involved in an appointment where they are related to an applicant, or have a close personal relationship with them outside work. Any such relationship should be declared to their line manager, whether or not they are involved in the appointment process.
- 8.2 Staff should not be involved in decisions relating to discipline, promotion or pay adjustments for any employee who is a relative, partner or close personal friend. The law and internal procedures for appointment, discipline and dismissal of staff must be observed.
- 8.3 Staff must not canvass the support of colleagues or trustees for any candidate applying for employment. They should resist & report any attempt by others to do so.
- 8.4 If an employee or a member of their family is a resident, trainee or other service user, they must not use their position as an employee to gain any advantage or preferential treatment.
- 8.5 Staff should not line manage, either directly or via a chain of management, a spouse or partner or member of their immediate family (child, grandchild, brother, sister or parent or grandparent of themselves or their spouse or partner). Where such relationships exist at the time of the introduction of this policy or arise subsequently as a result of a change in family circumstances all staff involved must inform their line manager immediately. The line managers should then consult both a Senior HR Advisor and the relevant director(s) with the objective of removing all possible conflicts of interest as soon as practicable.

8.6 All applicants for posts within the charity must be informed of the above requirements.

## **9 Outside Activities**

9.1 Nacro has no desire to place restrictions on, or interfere with an employee's private life. However there may be circumstances when an employee's external interests affect their employment.

9.2 Full time staff must obtain written consent from their Director before taking outside paid employment or setting up their own business. Part time staff must obtain written consent of their line manager before doing so. Consent must not be unreasonably refused. Outside employment or business interests must not interfere in any way with their existing job and should not conflict with the interests of their job or the Charity.

9.3 Staff are reminded that becoming a director, trustee or member of a management board places heavy duties upon them.

9.4 If a member of staff is invited to deliver a paper at a conference or to write an article by virtue of their connection with Nacro, they should seek line management approval. Any fee for such activities should be paid to Nacro.

9.5 Staff should obtain written permission from their Director before undertaking voluntary activities if those activities or organisations are in some way related to the activities of the Charity, (e.g., membership of the Committee of a local voluntary agency with whom the Charity has contact, or of the Committee/Board of a housing organisation). Staff should take particular care when involved with any organization that might be in competition with the Charity.

9.6 There may be circumstances in which conduct outside work, while not directly related to employment, might seriously contradict Nacro's values and/or adversely affect the reputation and perceived integrity of Nacro. There may be circumstances when conduct outside work, may result in disciplinary action being taken against an employee. Employees should, in particular, be aware that they are expected to uphold Nacro's equality and diversity and child protection policies at all times. (See also Section 10: Convictions)

## **Use of Facilities**

9.7 No paid outside work of any sort should be undertaken at an employee's Nacro place of work, and no use should be made of office, workshop, or other facilities (such as telephone, postage, or access to secretarial support) in connection with such work. This prohibition includes the receipt of correspondence and the use of a Nacro e-mail address. Incoming telephone calls and e-mails which are in connection with matters outside work must be discouraged. The prohibition extends to unpaid or voluntary activity unless staff have the written permission of their line manager and the use of facilities is minimal. The prohibition does not extend to work in connection with the trade union agreement.

## **Political Activity**

- 9.8 It is important that the Charity is seen to be politically neutral and not linked, directly or indirectly to any political organisation. Staff are free to join political groups, apart from those referred to in the Staff Guidance Note: Racist Political Organisations (Appendix C), and work and campaign on their behalf. However, such political activity must not compromise the Charity's neutrality.
- 9.9 Staff should discuss with their Director any intentions to stand for political office. There may be circumstances in which holding office may conflict with the Charity's interests.

## **10 Convictions**

- 10.1 Nacro's policy is that staff convicted of an offence in a work setting will normally be subject to disciplinary action. This could mean dismissal where the offence involves violence, sexual offending, theft, fraud, serious criminal damage, use of illegal drugs or serious driving offences, (for example dangerous driving), while on Nacro business, on Nacro premises or against another member of staff or a service user.
- 10.2 Where the offence does not occur in a work setting, Nacro's policy is that staff will not normally be subject to disciplinary action, including dismissal, unless the offence is one which is clearly and directly relevant to their job and would prejudice their ability to carry out their job either because it means they are a serious risk in the job or because they could no longer credibly do their job in view of their conviction.

## **11 Gifts and Hospitality**

11.1 Employees who receive gifts and/or hospitality should not place themselves under an obligation that might influence or be perceived to influence their future decisions or conduct.

11.2 Staff should not accept cash nor personal gifts with a significant monetary value under any circumstances. Gifts of nominal value, i.e., pens and similar items can be accepted. Where gifts are made to staff or departments that are of a moderate but not significant value they may be given to the winner of a staff lottery. In such circumstances the donor should be told how the gift has been distributed.

11.3 Staff should be cautious when accepting hospitality, ensuring that it is appropriate and not too lavish. Staff should be careful that the receipt of hospitality could not be construed as a way of exerting improper influence over them or Nacro. As a general rule they should not accept hospitality which Nacro would not reciprocate in similar circumstances.

*For example it would be acceptable for staff to attend a drinks reception given by a sponsor or funder or potential funder but not for them to accept an invitation to spend a weekend break in a 5 star hotel.*

11.4 Offers of hospitality should be recorded in the Hospitality Register. The Register should record whether the hospitality was accepted or declined and if accepted, why. Hospitality given on behalf of Nacro should also be recorded in the Register (see 11.7).

11.5 If staff have any doubt about hospitality offered to them, they should either decline or seek advice from their line manager.

11.6 When declining hospitality staff should be courteous, but draw the attention of the person making the offer to the existence of this Code.

### **The Hospitality Register**

11.7 The register is maintained by the Company Secretary (Director of Finance). Entries may be made by e-mail, fax or by post.

## **12 Declaration of Interests**

- 12.1 Employees, excluding volunteers and placements will be required to make a written disclosure to the Company Secretary indicating any connections which they have with external organisations, contractors/suppliers and any outside employment. They are responsible for updating the Register of Interests when changes occur. In declaring such interest they must consider any connections of their family or close friends which might conflict with those of the Charity. Staff considering taking on any outside activity should also refer to the requirements of section (see Outside Activities section).
- 12.2 Employees should declare any conflict of interest as and when it arises during the course of the Charity's business or other activities. Declarations should include connections or interests relating to the housing of tenants/applicants, letting of contracts, employment of staff, the sale or acquisition of property etc.
- 12.3 Staff should declare to their manager if they are a member of any organisation not open to the public which has secrecy about its rules or membership or conduct. A full definition of such an organisation is included in Appendix B.

### **For NCE Staff Only**

#### **Schedule 1 Housing Act 1996**

(The full text of the Act is included at Appendix A. NCE is not bound by the provisions of the act but the Board have agreed that the provisions of the schedule should be followed as a matter of best practice)

- 12.4 Employees of NCE or those who work with NCE should be aware of the requirements of Schedule 1 of the Housing Act 1996 and the restrictions which this places on the company, its employees and Board Members.
- 12.5 Schedule 1 (formerly section 15 of Housing Associations Act 1985) prohibits the company from making payments or providing benefits to employees other than those to which they are contractually entitled.
- 12.6 The restrictions extend to Board Members and to the close relatives of employees and Board Members. Benefits include the granting of tenancies, leases and contracts of employment.
- 12.7 If staff are in any doubt as to whether an action may contravene Schedule 1, they should seek the advice of their line manager, a Senior HR Advisor or the Company Secretary.

## Appendix A

*Housing Act 1996*

### SCHEDULE 1

#### REGISTERED SOCIAL LANDLORDS: REGULATION

##### PART I

##### CONTROL OF PAYMENTS TO MEMBERS, &C

###### *Payments by way of gift, dividend or bonus*

1.—(1) A registered social landlord shall not make a gift or pay a sum by way of dividend or bonus to—

- (a) a person who is or has been a member of the body,
- (b) a person who is a member of the family of a person within paragraph (a), or
- (c) a company of which a person within paragraph (a) or (b) is a director, except as permitted by this paragraph.

(2) The following are permitted—

- (a) the payment of a sum, which, in accordance with the constitution or rules of the body, is paid as interest on capital lent to the body or subscribed by way of shares in the body;
- (b) the payment by a fully mutual housing association to a person who has ceased to be a member of the association of a sum which is due to him either under his tenancy agreement with the association or under the terms of the agreement under which he became a member of the association.

(3) Where an industrial and provident society or a company registered under the Companies Act 1985 pays a sum or makes a gift in contravention of this paragraph, the society or company may recover the sum or the value of the gift, and proceedings for its recovery shall be taken if the Corporation so directs.

###### *Payments and benefits to officers and employees, &c.*

2.—(1) A registered social landlord which is an industrial and provident society or a company registered under the Companies Act 1985 shall not make a payment or grant a benefit to—

- (a) an officer or employee of the society or company,
- (b) a person who at any time within the preceding twelve months has been a person within paragraph (a),
- (c) a close relative of a person within paragraph (a) or (b), or
- (d) a business trading for profit of which a person falling within paragraph (a), (b) or (c) is a principal proprietor or in the management of which such a person is directly concerned,

except as permitted by this paragraph.

(2) The following are permitted—

- (a) payments made or benefits granted to an officer or employee of the society or company under his contract of employment with the society or company;
- (b) the payment of remuneration or expenses to an officer of the society or company who does not have a contract of employment with the society or company;

- (c) any such payment as may be made in accordance with paragraph 1(2) (interest payable in accordance with the rules and certain sums payable by a fully mutual housing association to a person who has ceased to be a member);
- (d) the grant or renewal of a tenancy by a co-operative housing association;
- (e) where a tenancy of a house has been granted to, or to a close relative of, a person who later became an officer or employee, the grant to that tenant of a new tenancy whether of the same or another house;
- (f) payments made or benefits granted in accordance with any determination made by the Corporation.

(3) A determination for the purposes of sub-paragraph (2)(f) may specify the class or classes of case in which a payment may be made or benefit granted and specify the maximum amount.

(4) Where a society or company pays a sum or grants a benefit in contravention of this paragraph, the society or company may recover the sum or value of the benefit; and proceedings for its recovery shall be taken if the Corporation so directs.

*Maximum amounts payable by way of fees, expenses, &c.*

3.—(1) The Corporation may from time to time specify the maximum amounts which may be paid by a registered social landlord which is an industrial and provident society or a company registered under the Companies Act 1985—

- (a) by way of fees or other remuneration, or by way of expenses, to a member of the society or company who is not an officer or employee of the society or company, or
- (b) by way of remuneration or expenses to an officer of the society or company who does not have a contract of employment with the society or company.

(2) Different amounts may be so specified for different purposes.

(3) Where a society or company makes a payment in excess of the maximum permitted under this paragraph, the society or company may recover the excess, and proceedings for its recovery shall be taken if the Corporation so directs.

## Appendix B:

### Definition of a Secret Society

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- 1 A secret society is any lodge, chapter, society, trust or regular gathering or meeting which:
  - is not open to members of the public who are not members of that lodge, chapter, society or trust;
  - includes in the grant of membership an obligation or requirement on the part of the member to make a commitment (whether by oath or otherwise) of allegiance to the lodge, chapter, society, gathering or meeting; and
  - includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.
  
- 2 A lodge, chapter, society, trust, gathering or meeting as defined above, should not be regarded as a secret society if it forms part of the activity of a generally recognised religion, nor should a chapter or branch of a trades union.

## Appendix C:



### Staff Guidance Note: Discriminatory Political Organisations

This guidance note has been produced to assist staff where organisations known for expressing racist views are active in the forums where Nacro works. It must be read alongside Nacro's Equality and Diversity Policy<sup>1</sup> and supporting documents such as the Dignity at Work policy<sup>2</sup>.

#### **Nacro's Equality Statement:**

Nacro is committed to promoting equality and diversity in all its activities. We are proud of the action we take to eliminate discrimination and prejudice and ensure inclusion and engagement for all the people who work for us and with us. We will continue to strive towards a culture that is diverse and which recognises and develops the potential of all staff and service users.

This means promoting equality and diversity for black and minority ethnic people, men and women, people of all ages, people with disabilities, people of every sexual orientation, refugees and asylum seekers, people of all religious faiths and beliefs, people with diverse communication needs and ex-offenders.

As the policy statement says it applies to all staff, service users, trustees, volunteers and those we work in partnership with.

*Nacro will not in any circumstances work with or for representatives of discriminatory political organisations and takes the view that any member of Nacro staff found to be in membership of the BNP, Combat 18, or National Front or any other discriminatory organisation will be dismissed. However, we recognise that while working with and for local authorities and some community groups we may find ourselves in forums where these organisations are represented (e.g. where a BNP councillor is a member of a council committee with which Nacro is working). In these circumstances it might be appropriate to continue, or enter into new work, in the interests of the communities, groups and individuals our services are aimed at. Care must be taken however to ensure that Nacro is not seen to be condoning in any way the views of discriminatory political organisations.*

<sup>1</sup> The Equality and Diversity Policy is in the 'Equality and Diversity All Users' folder on the S drive.

<sup>2</sup> The Dignity at Work Policy is available at [www.nbw.org.uk/P&P/1HR.htm](http://www.nbw.org.uk/P&P/1HR.htm) under 'Complaints and Disputes'.

### **There are a number of steps staff can take:**

- At the outset, agree with your line manager what action to take and liaise with them as the work progresses. Consult Nacro's Head of Equality Strategy if appropriate.
- If you are engaged on a piece of work with a local authority or any other organisation, ask for clarification in writing if possible on their policy in relation to discriminatory political organisations and what expectations they have on action to be taken when discriminatory and other offensive comments or action are made. This request should be made to the Chief Executives Office.
- If working in partnership with officers of a local authority, you should agree with them beforehand about which aspects they may be able to deal with should any problems occur (particularly if these are caused by an action perpetrated by an elected member of the council).
- Consider that a clause be written into the contract for work (or service level agreement) that makes it clear that Nacro has an equality and diversity policy and will work within its guidelines.

***The following is a recommended standard clause, however you may need to make additions to ensure that it covers the particular work that you will be engaged in:***

*"Nacro will not under any circumstance condone discrimination on the basis of colour, race, nationality, ethnic, national origin, religion, sexual orientation, gender, age or disability. Such conduct is wholly unacceptable, as is any abusive or insulting language or behaviour by any member of Nacro (staff, volunteer or service user as well as any third party (individual or organisation)).*

*Should any third party disrupt or use any forum or event facilitated by Nacro for the purpose of perpetrating discriminatory views or propaganda then Nacro will take all reasonable and proper actions to control the forum or event unless a prior agreement has been made with the organisation Nacro is working for. Nacro will invoke its own policies and procedures to deal with such incidents and the individual(s) responsible may be asked to leave. In circumstances where such discriminatory behaviour cannot be reasonably controlled, Nacro may postpone, or curtail the forum or event.*

*It is hereby agreed that Nacro will not be financially liable for any breach of contract or failure to provide services where such liability or failure arises from a curtailment, postponement or otherwise of a forum or event due to discriminatory behaviour by any third party."*

- Make available a full copy of the equality and diversity policy and this guidance note to all Nacro Managers.
- If facilitating a workshop or seminar – set some ground rules:

- Make it clear that offensive language is not acceptable.
  - That the diverse range of cultures within which the local authority (or other contracting body) works must be respected and included in the solutions agreed.
  - Make it clear that Nacro's ethos is centred on a commitment to equality, diversity and community cohesion.
  - Remind participants of the local authority's own policies, and that of any other organisations present.
  - Remind participants that if we all adhere to these ground rules we are more likely to find real solutions for the whole community.
- If you are directly challenged by anyone (including a member of a local authority) about any comment, or recommendations that you are making in reference to any "minority" community then remind them about the purpose of the work and if necessary the legal obligations of the council (or other contracting body) in meeting its obligations under equality and anti-discrimination laws. If the work is for a local authority you should also remind them of the council's obligation to ensure that the needs of all sections of the community are taken into account.
  - If any participants, including local authority members, make discriminatory comments – remind them of the ground rules, the authority's own policy, and be clear that their comments are offensive and obstructive to the objective of the meeting or the work being taken forward.
  - If any participants, including members of a local authority, try to 'hijack' a meeting or training event to talk about issues that are more relevant to their own political group than the event they are attending, remind them what the meeting is about and that they should take the issues raised to the appropriate forum. If the problem persists in a way, which frustrates the purpose of the meeting, you should take action to conclude the meeting immediately if you are the facilitator and if you are present as a participant or partner you should leave the meeting. Inform your line manager as soon as possible and prepare a letter for the Chief Executive of the local authority concerned detailing your reason for concluding or leaving the meeting. The letter should be agreed with your line manager and a copy sent to the lead officer for the contract within the local authority as well as to the relevant Nacro Director and Head of Equality Strategy.
  - All discriminatory/harassment/bullying incidents should be recorded and monitored in accordance with the Dignity at Work Policy, which covers such incidents.

**Paul Cavadino**  
**Chief Executive, Nacro**  
**August 2002, updated August 2007**

## Appendix D:

### Nacro Dress Code

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Nacro believes that we should have a clear dress code to **present a positive and professional image of the Charity**. The Code applies to all staff whether or not they are working in direct contact with the public, and whether they are male/female. The code is intended to help manage the 'impression' we give to members of the public, staff and clients. The code should help staff to think about the way they appear to service users, partners and funders.

Line managers will have the discretion to determine the appropriate standards of dress for staff reporting to them. Staff who wear clothing or jewellery, which causes offence or is inappropriate in any way, will be asked to go home to change or remove the item(s).

The following guidelines must be observed by all staff subject to any exceptions, e.g. medical or health & safety reasons:

1. We value cultural diversity and recognise that this is reflected in different styles of dress.
2. Nacro staff should dress neatly, modestly and appropriately.
3. Staff may wear shorts and sleeveless tops but are reminded that such clothing may be contrary to guidelines for staff working in prisons (see below) and may offend some cultural groups.
4. Staff are further reminded that they are responsible for protecting themselves from the sun and that Nacro will not accept responsibility for their failure to do so.
5. T-shirts or other clothing or accessories with slogans, which may be offensive or which are overtly political or against the aims and objectives of Nacro must not be worn.
6. Baseball caps and other headgear may be worn where the manager considers it appropriate.
7. If staff listen to music or non-work related audio during their working hours they must ensure that it does not create a poor impression or adversely affect their or their colleagues work.
8. Staff will be expected to dress appropriately (smartly) on formal occasions when representing/appearing on behalf of Nacro for example when meeting funders, at legal establishments or public meetings.
9. Staff working in prisons must follow the guidelines and regulations made from time to time by the Prison Service.

10. Protective Clothing must be worn, if after a sufficient risk assessment has been conducted, the results deem it necessary (protective clothing will be provided by Nacro).
11. Failure to comply with the code may be regarded as a disciplinary offence if staff do not comply with their manager's reasonable requests to modify their clothing. The Dress Code may be amended from time to time, and staff will be notified of any changes.