

# Safeguarding Code of Conduct

Gym Free is committed to maintaining the highest standards of conduct, integrity and ethics amongst all its staff and associated personnel.

If anyone has any genuine concerns about malpractice in the workplace, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be protected from victimisation and dismissal.

## Code of Conduct Standards

This Code of Conduct sets out the conduct expected of all Gym Free employees and suppliers. The key points are detailed below:

Gym Free employees must:

- Uphold the integrity and reputation of Gym Free by ensuring that their professional and personal conduct is consistent with Gym Free's values and standards
- Not engage in abusive or exploitative conduct
- Ensure the safety, health and welfare of all Gym Free staff members and associated personnel
- Be responsible for the use of information, assets and resources to which they have access by reason of their employment with Gym Free
- Perform my duties and conduct their private life in a manner that avoids conflicts of interest
- Uphold confidentiality

A full version of the Code of Conducts Standards can be found in Appendix A.

The Code is applicable at all times. Breaches of the Code are grounds for disciplinary action, up to and including dismissal.

## Training

### Staff

As part of the induction process, when new employees join Gym Free they will receive training on our Safeguarding Policy and Gym Free's expectations as outlined within the Codes of Conduct Standards detailed above. This training will be delivered in the form of a recorded webinar which has been delivered by external compliance consultants and which will provide employees with an overview of their key duties and responsibilities in terms of safeguarding and the potential consequences of non-compliance.

In addition, employees will receive annual refresher training on safeguarding issues. Again, this will be delivered in webinar format and can be accessed by employees on demand.

## **Safeguarding Lead**

In addition to the training detailed above, the Safeguarding lead will undertake annual training on developments and issues specifically relating to safeguarding in further education. This will predominately be delivered in the form of recorded webinars, however if the employee requires interactive training, Gym Free will arrange for external experts to attend the Gym Free offices.

## **Apprentices**

The Safeguarding Policy is at the core of how Gym Free operates as an employer and an education and training provider and as such safeguarding is integral to our apprenticeship delivery.

Apprentices will receive training on safeguarding as part of their induction when joining Gym Free; This training will be delivered in the form of recorded webinars which have been delivered by external compliance consultants and which will provide apprentices with an overview of what safeguarding is, the standards which Gym Free expects of its employees and what to do if they have a concern regarding safeguarding.

Safeguarding is also a key component of the apprenticeship review process; Apprentices are encouraged to discuss any issues or questions they may have with their Assessor via telephone, online live webinar or face-to-face sessions as appropriate.

In addition, safeguarding referral details are promoted within the apprentice's learning materials and are detailed on our website.

## **Malpractice**

Gym Free staff are obligated to report any potential incident, abuse or concern that they witness, are made aware of, or suspect which appears to breach the Code of Conduct Standards.

Malpractice includes (but is not limited to) the issues listed below:

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Sexual misconduct, including sexual abuse, harassment or exploitation
- Abuse or exploitation of children, vulnerable adults or beneficiaries
- Breach of Code of Conduct Standards
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above

If you genuinely believe that the actions of someone who works for Gym Free could lead to or has resulted in malpractice, please follow the procedure below:

1. Raise the matter with your line manager, who will consult with the appropriate contact point. If you feel that you are unable to raise the matter with your line manager, and you are able to, raise it with a more senior manager.

At the point of raising a concern it would be useful for you to share information describing:

- Whether anyone is at immediate risk of harm?
- What happened? If possible, make note of dates, times, places, people.
- Who is involved?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

All managers should report the following to the designated Safeguard Lead:

- Incidents of theft, fraud, or corruption
- Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults or any Gym Free representative
- Any other incidents of malpractice in the workplace

2. A decision will be made on whether it is appropriate to handle such complaints under this policy. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

Gym Free will take appropriate action against any employee who:

- Has been found to be victimising another individual for using this procedure or deterring them from reporting genuine concerns under it
- Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.

## **Complaints and Reporting**

Receiving feedback and responding to complaints is an important part of improving Gym Free's accountability.

A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action, by Gym Free or its staff and associated personnel. It is a criticism that expects a reply and would like things to be changed. Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with about the quality of programme delivery
- Concern about the behaviour of staff or associated personnel

Whilst it is hoped that most complaints or concerns about Gym Free's work or behaviour can and will be dealt with informally by staff at a local level, it is recognised that not all issues can be resolved in this way and that a formal

complaints mechanism is required for those occasions when an apprentice, apprentice employer or other individual / organisation wishes to make their complaint a matter of record and to receive a formal response.

### **How to Make a Complaint**

All formal complaints should be made in writing either directly from the individual or organisation making the complaint or via someone acting on their behalf.

Complaints should be addressed to Gym Free's designated Safeguarding Lead, Lee Brogan, who has ultimate responsibility for establishing and maintaining safeguarding. Please see below:

Lee Brogan, Managing Director

Postal address - Willaston Physio, Gateway House Old Hall Road, Bromborough, Wirral, England, CH62 3NX

Email address – lee.brogan@gymfreetrainers.co.uk

These procedures do not apply to complaints that are subject to current investigation by any regulatory body or other legal or official authorities. Such issues will be dealt with by the relevant regulatory body.

If Gym Free does not have the capacity to investigate a complaint, or if it is determined that specialist support is required to properly address the matter, Gym Free will direct the individual to the appropriate regulatory body or authority.

## **Appendix A**

### **Code of Conduct Standards**

As a Gym Free employee I will:

#### **Uphold the integrity and reputation of Gym Free by ensuring that my professional and personal conduct is consistent with Gym Free's values and standards**

- I will treat all people fairly with respect and dignity
- I will seek to ensure that my conduct does not bring Gym Free into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed
- I will not work under the influence of alcohol or use, or be in possession of, illegal substances on Gym Free premises

#### **Not engage in abusive or exploitative conduct**

- I will not engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence
- I will not exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance
- I will not engage in sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics
- I will not engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking
- I will not physically assault a child or vulnerable adult
- I will not emotionally or psychologically abuse a child or vulnerable adult

#### **Ensure the safety, health and welfare of all Gym Free staff members and associated personnel**

- I will adhere to all legal and organisational health and safety requirements in force at my location of work
- I will behave in a manner such as to avoid any unnecessary risk to the safety, health and welfare of myself and others with whom we work

**Be responsible for the use of information, assets and resources to which I have access by reason of my employment with Gym Free**

- I will ensure that I use Gym Free assets and resources entrusted to me in a responsible manner and will account for all money and property
- I will not use Gym Free IT equipment, software or e-mail and social media platforms to engage in activity that is illegal or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism
- I will not use Gym Free IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse

**Perform my duties and conduct my private life in a manner that avoids conflicts of interest**

- I will declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of Gym Free
- I will not be involved in awarding benefits, contracts for goods or services, employment or promotion within Gym Free, to any person with whom I have a financial, personal, family (or close intimate relationship) interests
- I will not accept significant gifts or any remuneration from the government, professional bodies with whom we work, suppliers and other persons which have been offered to me as a result of my employment with Gym Free

**Uphold confidentiality**

- I will exercise due care in all matters of official business, and not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so