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Staff code of conduct

Location	Oxford Campus, C/o Activate Learning, Jericho Building, Oxford OX1 1SA
Monitoring	The Principal , HR, Heads of Programme
Author	Birgit Muller – Office manager
Overall responsibility	Board of Directors
Created	August 2021
Last review date	August 2025
Next review date	August 2026 or as necessary

1. Purpose

The purpose of this code of conduct is to provide a clear framework for the behaviour, which is expected of all members of staff, whether they are employees and self-employed, of EM Normandie UK Limited (hereafter 'EMN' or 'the school'). EMN strives to create and maintain an environment for all members of the EMN community in Oxford in which honesty, integrity and respect for others is at all times actively demonstrated through personal behaviour and standards of conduct adopted by all.

2. Principles

EMN recognises the impact that the conduct of its members of staff and self-employed members of the EMN community has on the education and personal development of our students, on the wellbeing of our staff and the quality of the environment in which we work as well as on the reputation of EM Normandie as a whole.

It is essential that parents, students and those professional bodies who assess EM Normandie as a whole and EM Normandie UK in particular, are confident in our willingness and ability to uphold high standards of academic excellence, probity and ethical behaviour and that decision-making is at all times open, fair and transparent.

This code covers some of the most important issues relating to personal conduct and provides a framework of standards and guidelines regarding behaviour, but it is not intended to be exhaustive.

3. Equality, Diversity and Inclusion

EMN promotes equality, inclusivity and diversity and seeks to provide an environment for study and work which is respectful, supportive and impartial for all members of the EMN community, regardless of their age, ability, sex, gender identification, marital status , race, ethnic background, culture, sexual orientation, religion or belief and socio-economic status. We are aiming to support and encourage all to perform to their full potential.

4. Sexual misconduct, harassment and bullying

EMN wishes to maintain an environment in which students and members of staff are able to flourish and to achieve their full potential. We are committed to ensuring that everyone is able to work or study with us



UK

without fear of harassment, bullying, intimidation and without becoming the victim of unwanted sexual behaviour.

EMN has a detailed 'Anti Bullying, Harassment and Sexual Harassment Policy' and will investigate and, where appropriate, take action against any person displaying a lack of respect for others and/or who behaves in a way which leaves others feel harassed, intimidated or threatened.

Please read the 'EMN Anti Bullying, Harassment and Sexual Harassment Policy' at www.em-normandie.co.uk

5. Freedom of speech and academic freedom

All members of staff have to abide by and should therefore be fully aware of their rights and responsibilities under the company's 'Statement on Freedom of Speech' and 'Statement of Principles on Academic Freedom', available at www.em-normandie.co.uk

6. Safeguarding and Prevent

All members of staff have an important role to play in keeping students safe from any risk of neglect, abuse, grooming, exploitation or radicalisation and must be aware of the duties and procedures outlined in the Safeguarding and Prevent policies to ensure timely identification of students who may be at risk and prompt intervention to provide the relevant support. Policies can be found at www.em-normandie.co.uk

7. Health and safety

EMN seeks to provide a safe working and learning environment. Health and Safety is everyone's responsibility, and all members of staff are asked to complete the Health and Safety training provided by the company and to familiarise themselves with the Health and Safety Policy and all relevant Risk Assessments.

All activities should be carried out with the highest regard for the health and safety of employees, students, visitors and the public.

Please read the 'EMN Health and Safety Policy' at www.em-normandie.co.uk

8. Relationships with other members of staff and students

EMN does not concern itself with the private lives of its staff and self-employed members of the EMN community, unless the school's operations, its reputation or our students' and other members' wellbeing is affected.

Members of staff who are related or in a close personal relationship, should not normally have a supervisory, assessing or authorising work relationship.

Members of staff and self-employed members of the EMN community must inform their line manager if they have a close personal relationship with another member of the EMN community, which could have or could be perceived as having, an impact on their conduct at work.

EMN does not permit any close personal relationships between an employee or a self-employed person engaged by EMN, and a student, except in the context of family relations.

Please also refer to our 'Conflict-of-interest Policy' at www.em-normandie.co.uk

All employees and self-employed persons engaged by EMN must ensure that their behaviour towards students is above reproach and exercise their professional judgement to avoid situations where their behaviour falls short, or could be perceived as falling short, of this expectation.



UK

9. Performance

EMN expects individuals to follow all reasonable rules and instructions given by those supervising or managing their activities and/or work areas and to respect the provisions contained in the company's policies and procedures.

10. Misuse of drugs and alcohol

It is a disciplinary offence to consume alcohol or drugs during working hours on EMN premises and/or to carry out official duties when under the influence of alcohol or non-medically prescribed drugs.

Please read the EMN Substance Misuse Policy at www.em-normandie.co.uk

11. Gambling

Gambling is not allowed on EMN premises unless it has to be authorised by the Principal and is limited to activities such as small raffles for charitable purposes, occasional sweepstakes, etc.

12. Conduct outside work

EMN does not seek to interfere with its staff members' and self-employed persons' conduct outside of work. However, all must be aware that their conduct outside work may have an impact on people's views and opinions of the school. Disciplinary action may be taken by the school if actions by an individual involve any kind of illegal, discriminatory, anti-social or any other form of behaviour, that could have a negative impact on the school's reputation.

13. Dress code

EMN does not have a dress code, nevertheless dress must be appropriate for the situation in which each individual finds themselves in the context of their activity for EMN and an appropriate professional image should be displayed at all times.

14. Academic integrity

All EMN members of staff and self-employed individuals have a duty to uphold the highest standards regarding all teaching and research undertaken for and on behalf of EMN.

A culture of academic integrity relies on a strong approach to anti-plagiarism . We define plagiarism as

“the wrongful appropriation of the ideas or the expression of the ideas of another without attribution »
(Deborah Rhode, Cheating, Ethics in Everyday Life)

We expect all stakeholders (students, teachers, faculty, etc.) to correctly attribute any ideas and information they use in their work that are not their own and identify any sections of work produced with the help of AI, whether as part of written pieces of work or used in oral presentations.

15. Improper Payments and Bribes

EMN members of staff or self-employed persons within the EMN community must comply with the provisions of the Bribery Act 2010 and must never, with a view of gaining an advantage or influencing a decision, either offer, promise, give, request, accept or receive a financial or any other reward in return for an improper performance of their own or another person's duties, in any context.



UK

The Principal must be notified of any gifts, received by members of staff and invitations to hospitality events can only be accepted with prior authorisation from the Principal. If the Principal is the receiver, he/she must notify and seek authorisation to accept the gift or invitation from the Chair of the Board of Directors.

The acceptance or offer of any improper payment or bribe may be treated as a material breach of contract and lead to the immediate termination of a contract in the case of a self-employed person and in disciplinary action up to and including dismissal and/ or legal prosecution in the case of employees.

16. False Statements

Members of staff or self-employed persons must not make any false statement or provide false or misleading information in any context including, but not limited to, in the context of expenses claims, extra hours declarations, holiday requests, sick leave, etc.

Making false statements and/or providing false or misleading information may be treated as a material breach of contract and may lead to the immediate termination of a contract in the case of a self-employed person and in disciplinary action up to and including dismissal and/ or legal prosecution in the case of employees.

17. Conflicts of interest

The behaviour of EMN members of staff and self-employed individuals is expected to be of the highest academical and ethical standard in all areas, especially where individuals are in positions which may have significant impact on others.

It is important that decisions are taken fairly, openly and in a timely and transparent manner which will withstand internal and external scrutiny. Conflicts of interest must be notified to the Principal or to the Board of Directors. Please consult the Conflict-of-Interest Policy at www.em-normandie.co.uk

18. Data protection and access to confidential information

EMN holds and processes information about employees, self-employed individuals, students, and other data subjects for academic and administrative purposes, in the context of accreditation proceedings and compliance with the Office for Students' registration in the UK. When handling such information, EMN and all members of staff or others who process or use any personal information, must comply with the Data Protection Principles which are set out in the Data Protection Act 1998. Any doubts or queries about data protection issues should be referred for guidance to the Information Compliance Officer.

Please read the EMN Data Protection Policy and EMN Recruitment Privacy Notice www.em-normandie.co.uk

19. Use of IT equipment, internet and social media

The following applies to all members of staff and self-employed individuals, whether they are on site or accessing EMN and the EMN group's network and intranet remotely using their own or EMN equipment devices and equipment.

Whilst we encourage the use of technology to improve our business and administrative systems and to facilitate the exchange of communication, no member of staff during the course of their employment or self-employed individual during the course of their engagement is allowed to

- use the school's e-mail or intranet to exchange or post inappropriate, offensive, indecent, obscene or illegal messages
- use EMN's IT equipment or any of its network to create, view, transmit, store or display offensive, indecent, obscene or any illegal material



UK

- post inappropriate, offensive, indecent, obscene or any illegal texts or images on social media networks

Members of staff may use the school's internet facilities for occasional personal matters but must not access social media for personal purposes during working hours.

20. Information security

EMN recognises that information and the associated processes, systems and networks are valuable assets, and that the management of personal data has important implications for individuals. Through its policies, procedures and structures, the school seeks to facilitate the secure and uninterrupted flow of information, both within the EMN group and externally. The school believes that security is an integral part of the information sharing which is essential to academic and corporate endeavours. The 'IT – Acceptable User Policy' provides a framework which aims at ensuring the secure exchange of information.

21. Prevention and detection of fraud

All EMN members of staff and self-employed persons have a responsibility for preventing and detecting fraud, bribery, corruption and other irregularities and to report them to the Principal, the Board of Directors or, where applicable, directly to any relevant external authorities such as the police.

22. Raising matters of concern (Whistleblowing)

Employees have a right and a duty to raise any concerns regarding serious malpractice or wrongdoing within the organisation.

EMN will never sanction or penalise any member of staff who raises any such concerns in good faith.

Please read the *EMN Whistleblowing Policy* at www.em-normandie.co.uk

23. Breaches of the code's provisions

This is not a contractual document and can therefore be amended by EMN at any time. All members of staff and self-employed individuals engaged by EMN must comply with the provisions outlined in this code and all EMN's policies and procedures - whether referred to in this document or not, updated from time to time, and available on demand from the Office Manager, the Principal or at www.em-normandie.co.uk

Breaches of these provisions will be taken seriously and may result in disciplinary action and/or termination of contract if appropriate. Serious cases of misconduct may result in immediate dismissal or, in the case of adjunct lecturers, immediate termination of contract.

Allegations made against an employee will be dealt with in accordance with the disciplinary procedure.

Annex 1 - Control table

Version	v1	Name	Role	Date
Created by :		Birgit Muller	Office Manager	Aug 2021
Approved by :		Miriam Schmidkonz, Principal		
Version	v2	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Feb 2023
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v3	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Nov 2023
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v4	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v5	Name	Role	Date
Reviewed by :		Birgit Muller	Office Manager	Aug 2025
		Some minor changes to wording; inclusion of AI (14.); IT security to be finalised		
Changes approved by :		Miriam Schmidkonz, Principal		
Version				
Reviewed by :				
Changes approved by :				