



Code of Ethics and Business Conduct 2026

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Policy

It is the policy of Integrating to provide our Code of Ethics and Business Conduct, which will serve as a guide to proper business conduct for all employees. We expect all employees to observe the highest standards of ethics and integrity in their conduct. This means following a basic code of ethical behaviour that includes the following.

Build Trust and Credibility

The success of our organisation is dependent on the trust and confidence we earn from our employees, the children, young people and families we support and the organisations which fund our work. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching organisational goals solely through honourable conduct.

When considering any action, it is wise to ask:

- Will this build trust and credibility for Integrating?
- Will it help create a working environment in which Integrating can succeed over the long term?
- Is the commitment I am making one I can follow through with?

The only way we will maximise trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Integrating is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

Integrating is an equal opportunities employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behaviour. Any employee who feels harassed or discriminated against should report the incident to their manager or to the Vice Chair of Trustees who is responsible for managing any such concerns.

Create a Culture of Open and Honest Communication

At Integrating everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where staff and volunteers feel comfortable raising such questions. We all benefit when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Integrating will investigate all reported instances of questionable behaviour. In every instance where improper behaviour is found to have occurred, Integrating will take appropriate action.

Set the Tone at the Top

Managers and trustees have the added responsibility for demonstrating, through their actions, the importance of this code. In any business, ethical behaviour does not simply happen; it is the product of clear and direct communication of behavioural expectations, modelled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our code work, trustees and managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. We want the ethics dialogue to become a natural part of daily work.

It is expected that trustees and managers:

- Act in a way which respects others yet can challenge their views and behaviour
- Understand each other's motivation for being involved with the organisation
- Plan their work and meetings
- Make sure we do what we say we will do
- Will get specialist advice when needed

A trustee is appointed to monitor behaviour within the board and together with the Project Manager will report back to the board at least annually, normally following the open forum where stakeholders are able to express their views on the organisation.

Uphold the Law

Our commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must understand Integrating policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Company policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Safeguarding

We are dedicated to ensuring the children and young adults we provide a service for are safe both whilst working with Integrating and in their broader lives. Staff must understand the organisation's Safeguarding Policy and operate with it in mind at all times. If there are ever any concerns or queries, these should always be raised with managers.

Disclosure

We will not disclose information (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any information with respect to

- Individual children, young people or families without clear reason and authority from a manager to do this. The only exception to this would be in an emergency or within the Safeguarding Procedures where not to share information would cause actual harm to an individual.
- Integrating's business operations, plans, financial condition, results of operations or any development plan without the authority of a manager or trustee.

Avoid Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Integrating may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for Integrating. We owe a duty to Integrating to advance its legitimate interests when the opportunity to do so arises. We must never use Integrating's property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Integrating.

Determining whether a conflict of interest exists is not always easy to do. Volunteers (including trustees) and employees with a conflict-of-interest question should seek advice from management or the Chair of Trustees.

Political Activity and Campaigning

Everyone at Integrating is responsible for making sure the charity follows the rules on political activity and campaign. We abide by the guidance set out by the Charity Commission for England and Wales found here <https://www.gov.uk/guidance/political-activity-and-campaigning-by-charities>.

Accepting Gifts

Most gifts offered to us in the course of our work are offered because of our positions at Integrating. Often gifts are offered simply to express appreciation of the work we have done with a child or young person. We should not feel any entitlement to be offered or to accept and keep a gift. The prudent course is to refuse a gift from a child / family but should a small gift (a monetary value of £5 or less) be offered and you feel it is likely to offend if not accepted, the gift can be accepted and a record made. At the discretion of the staff member the gift may be regifted to the organisation.

Offering Gifts

There are no circumstances when Integrating trustees or staff would offer gifts to business partners or funders other than the disposal of unwanted assets to other charities.

There are occasions when the trustees may agree to make a gift to a member of staff or volunteers in recognition of their service or circumstance e.g. flowers may be given to a member of staff in hospital.

Monitor Work and Report Results Accurately

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports are full, fair, accurate, timely and understandable. This obligation applies to all employees and volunteers, including all staff and volunteers with specific financial responsibilities, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform the Chair of Trustees if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Organisational Recordkeeping

We create, retain and dispose of our organisation's records as part of our normal course of business in compliance with all Integrating's policies and guidelines, as well as all contractual, regulatory and legal requirements.

All organisational records must be true, accurate and complete, and company data must be promptly and accurately entered in our records in accordance with Integrating's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of Integrating's books, records, processes or internal controls.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set out in this code and for raising questions if we are uncertain about organisational policy. If we are concerned whether the standards are being met or are aware of violations of the code, we must contact the Chair of Trustees. We take seriously the standards set forth in the code, and violations are cause for disciplinary action up to and including termination of employment.

Use of Company Resources

Organisation resources, including time, material, equipment and information, are provided for Integrating's business use. Nonetheless, occasional personal use is permissible if it does not affect job performance or cause a disruption to the workplace. Employees and those who represent Integrating are trusted to behave responsibly and use departments and are empowered to resolve issues concerning their proper use.

We will not use company equipment such as computers or copiers for anything other than Integrating's work. To protect the interests of the Integrating network and our fellow staff and volunteers, we reserve the right to monitor or review all data and information contained on company-issued computers or electronic devices. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Compliance

Compliance with these principles is an essential element in our business success. Our Board of Trustees is responsible for ensuring these principles are communicated to and understood and observed by all staff and volunteers. Day to day responsibility is delegated to all managers who are responsible for implementing these principles, if necessary, through more detailed guidance. Assurance of compliance is monitored and reported each year. Compliance with the code is subject to review by the board and subject to audit review. Staff are expected to bring to management's attention any breach or suspected breach of these principles. Provision has been made for employees to be able to report in confidence.

From time to time, employees will likely have questions as to how this Code of Ethics and Business Conduct applies in particular situations. We expect all employees with such questions to discuss the exact circumstances with our Chair of Trustees. Should the Chair of Trustees be uncertain on what actions should be taken to ensure compliance with this Code of Ethics and Business Conduct, they will obtain further guidance by consulting with the Board of Trustees and/or seek specialist external advice.

Signed:



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