

Code of Conduct

Introduction

This Code of Conduct draws together existing MCCC and MITC policies, guidance and other key employment related information.

MCCC and MITC aims to ensure the highest standards of conduct and will assist employees in performing their duties to the best of their ability.

The Code of Conduct should be read in conjunction with MCCC and MITC Safeguarding Policies and Procedures as set out at <https://www.middlesexccc.com/page/safeguarding-home>

Scope

This guidance applies to employees employed under the terms of MCCC and MITC Employment Conditions and temporary, casual and agency workers.

All board members are expected to conduct themselves in a way consistent with the provisions of their own Code of Conduct and, where applicable, this guidance.

Roles and Responsibilities

Both managers and employees have a responsibility under this Code of Conduct.

Managers will:

- Apply the policies and procedures detailed in this document.
- Ensure all employees are made aware of the Code of Conduct and all relevant policies and guidance on commencing employment with MCCC and MITC
- Deal promptly, thoroughly and fairly with any matter arising from a breach of this guidance.
- Set clear standards of conduct at work.

Employees will:

- Act in accordance with the Principles set out in this document
- Never use their office for personal gain
- Where it is part of their duties, provide appropriate advice to board members and fellow employees with impartiality
- Through procedures outlined in the relevant MCCC and MITC policies and guidance, bring to the attention of the appropriate level of management any deficiency in the provision of service or breach of this guidance
- Maintain conduct of the highest standard such that confidence in their integrity is sustained

Employees in roles that have their own professional code of conduct must appropriately apply the standards of their profession in line with this guidance.

Principles

The Code of Conduct is founded on the following principles:

- To ensure the highest standards of conduct and integrity from all employees of MCCC and MITC
- To support MCCC and MITC's visions and values, policies and guidance
- To set out clear objectives and expectations for all employees
- To ensure all employees treat colleagues and those they interact with during the course of their work with dignity and respect
- Not to discriminate against any individual in the application of this Code of Conduct on the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, maternity and pregnancy, race, caste, religion or belief, sex, sexual orientation, or other grounds protected in law (e.g. part-time worker status, trade union membership or HIV positive status).

Safeguarding Code of Conduct (Staff)

MCCC and MITC takes its role as a provider of cricket very seriously. We believe everyone's wellbeing is paramount, particularly children and vulnerable adults, in all decisions taken by us. All people we come into contact with have the same protection regardless of age, disability, gender, race, religious belief or sexual orientation.

We act in accordance with legislation, statutory guidance and the ECB Safe Hands Policy (2026) and work collaboratively with the ECB in relation to concerns around the safeguarding of children, young people and adults at risk.

To whom does this Safeguarding Code of Conduct Apply?

This Safeguarding Code of Conduct applies to all staff, as safeguarding is everyone's responsibility. It therefore applies to and is required to be signed by employees, consultants, contractors, casual and agency staff (collectively referred to as staff in this Code of Conduct). It does not apply to volunteers, who should adhere to the Volunteer Code of Conduct.

Staff Expectations

It is our expectation that all our staff will always act in the best interests of children, young people under the age of 18 and vulnerable adults and in accordance with the ECB Safe Hands Policy (2026). The welfare of children and young people must always be paramount.

This includes an expectation that staff will:

- Undertake safeguarding education or training as required by MCCC and MITC
- Read and comply with ECB Safe Hands Policy (2026).
- Read and comply with the MCCC Safeguarding Policy (2026).
- Be appropriately vetted if required to do so as specified in Safe Hands and the MCCC and MITC Safer Recruitment policy.

- Act in an appropriate way at all times when in contact with children, young people and adults at risk, whether face-to-face, via social media, phone or by any other electronic communications.
- Recognise the importance of confidentiality when working with children, young people, their families and their data.
- Promptly report any concerns about safeguarding or the protection of children or young people in cricket to the County Safeguarding Officer – Amber Wright safeguarding@middlesexccc.com or the Cricket Regulator Safeguarding Team safeguarding@cricketregulator.co.uk
- Read and adhere to the MCCC whistleblowing policy (2026) if you suspect or believe that safeguarding concerns have not been appropriately addressed by MCCC and MITC
- Accept that, by taking this role, you may be deemed to be in a relationship of trust with under-18 participants that you are in contact with.
- Act with integrity at all times.
- Seek advice from the County Safeguarding Officer or Cricket Regulator Safeguarding Team if required.

Further information and support

Further safeguarding information is available in <https://www.ecb.co.uk/about/policies-and-regulations/safeguarding> or at the Middlesex Cricket web- site <https://www.middlesexccc.com/page/safeguarding-our-policy>

If you have any queries or concerns regarding the Safeguarding Code of Conduct or safeguarding generally, please speak to our County Safeguarding Officer – Amber Wright on 07561853999 or at safeguarding@middlesexccc.com in the first instance.

On joining MCCC and MITC, all employees as part of their contract of employment are required to sign the Safeguarding Code of Conduct. The principles of this statement should be read in conjunction with this document.

Disclosure of Information and Confidentiality

Employees may, in the course of their employment become aware of personal or other confidential information, some of which may fall within the scope of the Data Protection Act 2018. MCCC and MITC requires that the confidentiality of this information will be respected.

Any particular information received by an employee from a board member that is personal to that board member should not be divulged by the employee without the prior approval of that board member, except where such disclosure is required by law. Equally board members are expected to maintain such confidence on personal information pertaining to any MCCC and MITC employees they may have been privy to.

Employees must not use information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way unless it is necessary and within the law to do so i.e. where a police investigation is necessary.

Information concerning an employee's private affairs will not be supplied to any person outside of MCCC and MITC unless the consent of the employee is obtained first. This includes inappropriate use of social networking websites such as Facebook, Instagram, Twitter, etc.

On joining MCCC and MITC, all employees as part of their contract of employment are required to sign a Confidentiality Statement, attached as Appendix 1. The principles of this statement should be read in conjunction with this document.

Commercial Practices including Gifts and Hospitality

The principal aim is to ensure that MCCC and MITC business is conducted in accordance with the very highest standards.

Employees should never use their office for personal gain and should seek to uphold and enhance the reputation of MCCC and MITC by:

- maintaining a high standard of integrity in all business and professional relationships
- fostering the highest possible standards of professional competence amongst those for whom they are responsible
- complying both with the letter and the spirit of:
 - the law
 - MCCC and MITC's Standing Orders and Financial Regulations
 - any additional guidance supplied by Directors/senior managers
 - the Conditions of Service of Employees of MCCC and MITC
 - rejecting any business practice which might reasonably be deemed improper

Prevention of Fraud and Corruption

MCCC and MITC are committed to ensuring the highest standards of propriety in the delivery of its services and management of its resources and assets.

All employees are expected to act with integrity at all times and to comply with legal requirements, rules, procedures and good practice.

Further guidance is set out in the Anti-Bribery Policy.

Raising Concerns in the Workplace – Grievances and Whistleblowing

MCCC and MITC believe that an employee should report any significant concern they may have about any aspect of service provision, or the conduct of employees, members of MCCC, or others acting on behalf of MCCC and MITC without fear of victimisation.

To enable employees to address such concerns, MCCC and MITC have developed a Whistleblowing Policy and Procedure, which incorporates the provisions of the Public Interest Disclosures Act 1998.

If an employee has a concern regarding their own employment this should be raised under MCCC and MITC's Grievance Policy and Procedure.

Dignity and Equality at Work

MCCC and MITC wishes to create an environment where all employees are treated with dignity and respect.

MCCC and MITC are committed to achieving equality of choice as an employer of people, provider of services, educator and community leader.

All employees are expected to adopt MCCC and MITC's vision of equality of opportunity and embrace the expectations outlined in the MCCC and MITC Equality in Employment Statement.

Close Personal Relationships at Work

MCCC and MITC will not interfere unduly in the private lives of employees but with the company interest in mind will take legitimate action when close personal relationships at work have an actual or potential impact on MCCC and MITC services (see Appendix 17 of the staff handbook for Guidance Notes).

MCCC and MITC adopt the Home Office guidelines which recommends the principle that people in position of trust and authority do not have sexual relationships with 16 - 17 year olds in their care or responsibility. MCCC and MITC regards as wholly unacceptable any close personal relationship between an employee and a child or young person who is under the age of 18 (19 if still at school), or a vulnerable adult client, whom they meet as a result of their employment.

Issues involving close personal relationships at work will be approached sensitively and managed promptly, effectively, fairly and lawfully.

Mutual respect between employees and board members is essential for effective running and development of MCCC and MITC. Some employees may need to work closely with board members. Close personal familiarity between employees and individual board members can damage the relationship and prove embarrassing to other employees and board members, and should therefore be avoided.

New Appointments

All staff employed in posts at managers level or above must disclose in writing to HR, any relationship between themselves and an applicant for employment by MCCC or MITC.

Employees involved in appointments must ensure that these are made on the basis of merit alone. There is a strong risk of illegality if an employee makes an appointment based on anything other than the ability of the applicant to undertake the duties of the post. To avoid accusations of bias, employees must not be involved in appointments where they are related to an applicant or otherwise have a close personal relationship with them or have knowledge of them in another context e.g. business associates.

Similarly, employees should not be involved in decisions relating to discipline, promotion, recruitment or pay and conditions for any other employee who is a relative, partner, close friend etc.

All applicants will be asked to declare any relationship to HR. Failure to do so could result in the withdrawal of the offer of appointment, or dismissal if already appointed.

Work for Other Organisations

Applicants for employment with MCCC and MITC will be asked to disclose any employment or work in any capacity they may have with other organisations. Failure to do so could result in the withdrawal of the offer of appointment, or dismissal if already appointed.

Employees below managers level must obtain prior written approval from their manager before undertaking work for other organisations. This includes work in any capacity e.g. contract of employment, consultancy or contract for services.

Employees at managers level or above may undertake other work outside of MCCC and MITC but must notify their manager of any additional employment or work in any capacity for other organisations.

In all instances where additional work is undertaken, the work must not conflict with, or be to the detriment of, an individual's employment with MCCC and MITC. If conflict or detriment is caused by additional work, action may be considered under the MCCC and MITC's Disciplinary or Capability Policies.

Employees should refer to the MCCC and MITC's Working Time Regulation guidelines when considering additional appointments or employment.

Communication, IT Equipment, Internet and Social Media Usage

Use of MCCC and MITC's equipment, systems and network is provided as part of an individual's work role.

Employees should be familiar with the IT and Internet Use and Social Media policies.

Violation of the ICT and Social Media policies may be grounds for disciplinary action, which, if found to constitute serious misconduct, could render an individual liable to dismissal.

Use of technology to contact individuals can suggest an informality which may be inappropriate. Great care should be exercised over the use of communications technology such as mobile phones, text messaging, emails, digital cameras, videos, web cams, websites and blogs. Communication that may cause offence or detriment to individuals may be subject to action under MCCC and MITC's Discipline Procedures.

Alcohol and Substance Misuse

MCCC and MITC have a policy on Alcohol and Substance Misuse in the Workplace which is aimed at ensuring that all those representing MCCC and MITC are aware of their responsibilities regarding alcohol and drugs at work.

Those representing MCCC and MITC are personally liable for their conduct, specifically in relation to consumption of drugs and alcohol.

Inappropriate behaviour as a result of substance misuse will be dealt with under the relevant policy e.g. Disciplinary, Capability.

Anti-Corruption

MCCC and MITC follow the ECB Anti-Corruption Policy which sets out the minimum standards for players' and match officials' as well as the Anti-Corruption Code aimed at maintaining the level playing field and protecting the authenticity and integrity of the sport of cricket. Details can be found at <https://www.ecb.co.uk/governance/anti-corruption>

Breach of the Code of Conduct

Failure to comply with this guidance and the associated MCCC and MITC policies may result in disciplinary action being taken.

MCCC and MITC reserves the right to take legal action against employees where breaches of the guidance warrant such action.

CONFIDENTIALITY STATEMENT - Appendix 1 to Code of Conduct

1. This statement applies to all workers in MCCC and MITC as appropriate to their duties.
2. In the course of his or her duties a worker is likely to have access to a considerable amount of personal information relating to clients, staff, contacts or Members. MCCC and MITC insist their workers preserve confidentiality of information. All information is confidential within MCCC and MITC and should only be provided on a 'need to know' basis.
3. The worker shall not at any time, whether during or after the termination of his or her employment, whether he or she resigns or is dismissed, divulge or communicate to any person, persons or body, whether incorporated or unincorporated any confidential information relating to the business affairs or trade secrets of MCCC and MITC or any client of MCCC and MITC unless authorised by MCCC and MITC to make such a disclosure nor shall he or she use such confidential information for any reason other than the business of MCCC and MITC. This includes but is not limited to information about MCCC and MITC's clients and employees and all details relating to information on the MCCC and MITC's databases.
4. MCCC and MITC expect all workers to read and comply with MCCC and MITC's IT & Internet Use Policy. Full details are available in the Staff Handbook.
5. MCCC and MITC are under a legal duty both to process personal information in accordance with the Data Protection Act 2018 and to respect the confidentiality of details held. All workers have a duty to manage knowledge and information in accordance with this legislation. Further details are contained in MCCC and MITC's Data Protection Policy in the Staff Handbook.
6. Any misuse of information including a breach of this confidentiality agreement, or the underlying policies it refers to, is a serious matter and may result in disciplinary proceedings including dismissal without notice. Criminal matters may also be referred to the police. Any decision to instigate disciplinary proceedings and/or refer a criminal matter to the police will be taken by MCCC and MITC. Further details on MCCC and MITC's Code of Conduct and Disciplinary Policy can be found in the Staff Handbook.
7. Access to electronic records may be monitored by MCCC and MITC. This includes accessing updating and amending files.
8. Any information on MCCC and MITC's systems may only be disclosed to an authorised person. No data should be released until the rights of an enquirer to seek such information have been confirmed and recorded. If in doubt contact your line manager.
9. Under no circumstances must workers access any records unless they have a responsibility to do so as part of their duties/contract of employment. If this involves accessing personal information about a family member, friend or acquaintance, then it is a requirement of your employment to report this fact to your line manager and seek their written consent to you accessing the said data.
10. If workers become aware that they know a client and/or family it is their responsibility to inform their line manager immediately so that appropriate arrangements can be made regarding the access to these particular records.



11. When recording information it must be clear whether it is factual or professional opinion. Records should be free of jargon. The file may be the main historic source of information about important events and/or decisions. Individuals are entitled to request to see information recorded about them and records should always be written with this in mind. Where appropriate, e.g. assessments, plans and reports, all parties' views should be recorded. Be aware that records marked as 'confidential' will be assessed when requested by clients to decide whether they continue to remain confidential.
12. All conversations relating to confidential matters (service users, employees, contracts, etc) should take place in a confidential setting and not where they could be overheard e.g. in corridors, stairs, etc.
13. E-mail correspondence must meet the same confidentiality principles as for all other written correspondence and be marked as confidential where appropriate. Great care must be taken in sending documents via external-e-mail as it is not a secure means of communicating confidential information.
14. In line with MCCC and MITC's policy, all confidential or personal paper documentation and portable media equipment (e.g. mobile phones, memory sticks/cards, hard drives, tablets, and laptops) should be stored securely when not in use. Portable media equipment should be password protected. Memory sticks should not be used unless encrypted.
15. In the event of data being lost or stolen, please inform your Line Manager who will take appropriate action in line with MCCC and MITC's DataBreach Policy.
16. All documentation with service user, employee personal information or contract data should be disposed of as confidential waste.
17. IT log on details will not be issued to workers until they have discussed, understood, agreed to comply with and signed this confidentiality statement.
18. Passwords must not be shared. Workers are responsible for all transactions recorded under their logon. Likewise workers need to be aware of and prevent anyone who is not authorised to do so, having visual access to their computer screen.
19. When working remotely, the above principles still apply. Make sure you delete all copies of data held locally on your PC when you finish.
20. When working with or coming into contact with children, young people or adults at risk you will act in their best interest and will observe and follow the Safeguarding Code of Conduct (Staff).
21. If you have concerns that another worker, or workers, may be in breach of the confidentiality standards set out in this statement, then these must be referred to your line manager. There is also a Whistle Blowing procedure for reporting concerns available on the Staff Handbook.

As a general point, confidentiality cannot always be guaranteed in relation to our overriding duty to promote and safeguard the wellbeing of children, young people and vulnerable adults. If, in the course of their duties, a worker has concerns that the welfare of a child, young person or vulnerable adult has been/may be compromised, then this

must be reported. Any concerns, questions or reports relating to safeguarding must be immediately directed to safeguarding@middlesexccc.com or Middlesex Cricket's Designated Safeguarding Lead Officer on 07561853999.

22. If you have any questions or are uncertain about the meaning of any part of this notice you are expected to speak to your line manager and ask for any necessary explanations

I have understood the above points and I agree to comply with these requirements.

I understand that any misuse of information including a breach of confidentiality, and/or breach of the Safeguarding Code of Conduct (Staff) is a serious matter and may result in disciplinary proceedings including dismissal without notice under MCCC and MITC's Disciplinary Policy.

Name in print:

Signed:

Date:

Document Owner: Head of People and Culture (Human Resources)

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