

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

## TTT POLICY DOCUMENT

# Staff Disciplinary and Sanctions Policy

*A fair, proportionate process for addressing conduct or performance concerns about TTT staff.*

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### Document Control

<b>Document Title</b>	Staff Disciplinary and Sanctions Policy
<b>Version</b>	1.0
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<b>Policy Owner</b>	Phenil Mehta, Centre Manager
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<b>Alternative Contact (where CM is subject)</b>	Shaily Mehta, shaily@theteachertrainer.co.uk
<b>Approved By</b>	Phenil Mehta, Centre Manager
<b>Classification</b>	Public
<b>Applies To</b>	All TTT employees, associates, contractors and volunteers

# Staff Disciplinary and Sanctions Policy

## 1. Purpose

This policy sets out a fair, consistent and proportionate process for addressing conduct or performance concerns about TTT staff, associates, contractors and volunteers. It operates alongside, but distinct from, the Sanctions Policy (learner), which addresses learner conduct. It draws on the ACAS Code of Practice on Disciplinary and Grievance Procedures 2015 and complies with the Employment Rights Act 1996 and the Equality Act 2010.

## 2. Scope

This policy applies to:

- All TTT employees
- All TTT associates, contractors and volunteers (with the process adapted proportionately to their contract type)
- Conduct and performance during TTT activity, including online and off-site interactions identifiably connected to TTT

This policy does not cover:

- Learner conduct (see the Sanctions Policy for learners)
- Staff grievances (see the Grievance Policy)
- Whistleblowing concerns (see the Whistleblowing Policy)
- Complaints from learners or the public (see the Complaints Policy)

## 3. Definitions

The following terms carry the meanings given throughout this policy.

<b>Misconduct</b>	Behaviour that breaches TTT policy or reasonable workplace standards but is not at the level of gross misconduct.
<b>Gross Misconduct</b>	Conduct so serious that it fundamentally breaches the employment or engagement relationship, typically justifying dismissal without notice following a fair process.
<b>Performance Concern</b>	An ongoing shortfall in the quality or output of work, addressed through the support pathway in Section 6.
<b>Informal Action</b>	A private conversation or written note intended to correct behaviour without formal process.
<b>Formal Action</b>	The structured process (investigation, hearing, outcome) set out in Section 8.
<b>Companion</b>	A work colleague or accredited trade union representative who may accompany the employee at a formal hearing, consistent with the Employment Relations Act 1999.

## 4. Policy Statement

TTT is committed to the following principles and commitments.

1. Concerns are addressed promptly, proportionately and consistently.
2. Individuals are told the concern clearly, in writing and given a reasonable opportunity to respond.
3. Informal resolution is used wherever appropriate before formal action.
4. The ACAS Code of Practice on Disciplinary and Grievance Procedures is followed for employees.
5. Conduct and performance are kept distinct; performance concerns are addressed supportively before any disciplinary step.
6. Individuals have the right to be accompanied at formal hearings.
7. Individuals have the right to appeal a formal outcome.
8. Records are kept confidential and used only for this process.
9. Decisions do not discriminate on the basis of any protected characteristic under the Equality Act 2010.

## 5. Roles and Responsibilities

Role	Responsibility
Centre Manager (Phenil Mehta)	Overall accountability; conducts investigations and hearings where not conflicted; takes final decisions on outcomes; signs off this policy annually.
Alternative Contact (Shaily Mehta)	Takes the lead role where the Centre Manager is the subject of or is otherwise conflicted. May engage an external HR consultant for independence where needed.
Course Coordinator	Administers the process, manages timescales, takes meeting notes, maintains case files.
Individuals subject to the process	Engage honestly; attend meetings; bring a companion if they wish; provide evidence and responses requested.

## 6. Performance Concerns (Capability)

Performance concerns are addressed through a supportive capability pathway before any disciplinary step is considered.

1. Concern raised: the Centre Manager sets out the specific shortfall in writing and discusses it with the individual.
2. Support and improvement plan: agreed objectives, measures, time frame (typically 4 to 12 weeks) and any training, mentoring or adjustments needed.
3. Review meetings: regular check-ins during the improvement period, with written notes.
4. Outcome: performance restored, further period of support or referral to formal disciplinary action if sustained shortfall continues after reasonable support.

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Where a performance concern relates to a safeguarding, data protection or other policy breach, it is addressed under the disciplinary route in Section 8 rather than the capability route.

## 7. Informal Resolution

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- Minor conduct concerns are typically addressed through an informal conversation by the Centre Manager
- A short written note of the conversation may be retained on the personal file
- Informal action does not constitute a formal sanction and does not limit the individual's options in any later process

## 8. Formal Disciplinary Procedure

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Where informal resolution is not appropriate, not successful or the alleged conduct is serious, the formal procedure applies.

### 8.1 Stage 1: Investigation

- The Centre Manager (or Alternative Contact) appoints an investigator. For smaller cases, this may be the Centre Manager; for serious or conflicted cases, an external HR consultant is engaged
- The individual is told in writing that an investigation is under way, the nature of the concern and the process
- The investigator gathers evidence, including interviewing the individual and any witnesses
- The investigator produces a written report identifying the facts established, the issues to be determined and any recommendations
- Suspension with pay may be considered where continued attendance poses risk; suspension is neutral, not a sanction and is kept as short as reasonably possible

### 8.2 Stage 2: Hearing

- Where the investigation finds that a case should be answered, the individual is invited to a disciplinary hearing in writing, giving a minimum of 7 calendar days' notice
- The invitation sets out the concern, the possible outcomes, the evidence to be relied on and the right to be accompanied by a companion
- The hearing is chaired by the Centre Manager (or Alternative Contact), with a separate note-taker
- The individual hears the concern, responds, calls any witnesses and responds to questions
- The hearing is adjourned to allow the chair to consider the outcome; the outcome is communicated in writing, typically within 7 calendar days

### 8.3 Stage 3: Outcome

The chair considers the evidence on the balance of probabilities and may decide on one of the following proportionate outcomes.

Outcome	When typically applied
No further action	Where the concern is not upheld or is not serious enough to warrant sanction
Informal note on file (spent after 6 months)	Minor first-time misconduct
First Written Warning (spent after 6 months)	Misconduct that is more than minor, where a signal is needed; or where informal action has not resolved the issue
Final Written Warning (spent after 12 months)	Repeated misconduct; or a single act serious enough to warrant it but short of gross misconduct
Dismissal with notice	Where misconduct is serious or a final written warning is still live and further misconduct has occurred
Summary dismissal (without notice)	Gross misconduct, where the trust and confidence of the employment or engagement is fundamentally breached
Sanctions for associates and contractors	Equivalent proportionate outcomes up to and including termination of the service agreement

## 9. Examples of Misconduct and Gross Misconduct

The following is illustrative, not exhaustive. Misconduct typically includes:

- Unauthorised absence or persistent lateness
- Minor failure to follow reasonable instructions
- Minor breach of a TTT policy
- Inappropriate language or tone with colleagues or learners, short of harassment
- Gross misconduct typically includes:
  - Theft, fraud, bribery or deliberate falsification of records
  - Serious safeguarding breach, including failure to report a disclosure
  - Physical or serious verbal abuse of a learner or colleague
  - Harassment, discrimination or bullying contrary to the Equality Act 2010
  - Serious data protection or confidentiality breach
  - Serious malpractice or maladministration affecting assessment outcomes
  - Breach of the Anti-Bribery and Corruption Policy
  - Attending TTT activity under the influence of drugs or alcohol
  - Serious breach of the Information Security and Cyber Security Policy
  - Conduct that brings TTT into serious disrepute

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## 10. Suspension

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- Suspension is considered where continued attendance could prejudice an investigation, risk further incidents or endanger learners, colleagues or TTT
- Suspension is always neutral and on full pay for employees; it is not a sanction
- The reasons for suspension are put in writing and suspension is reviewed regularly
- Suspension is kept as short as reasonably possible

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## 11. Appeals

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- The individual may appeal any formal outcome by writing to the Centre Manager within 7 calendar days of receiving the outcome letter, setting out the grounds of appeal
- Appeals are heard by a person who was not involved in the original decision; for TTT's small size this is typically the Alternative Contact or an external HR consultant
- Grounds of appeal typically include: the outcome was not supported by the evidence; the process was materially flawed; the sanction was disproportionate; new evidence has come to light
- The appeal hearing is held within a reasonable period, with minimum 7 calendar days' notice and the right to be accompanied
- The appeal decision is final at internal level

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## 12. External Referrals

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Where appropriate, TTT makes external referrals in parallel with or following internal action. These may include:

- The Awarding Organisation, where the conduct affects qualification integrity
- The Disclosure and Barring Service, where the conduct concerns safeguarding of vulnerable individuals
- The Society for Education and Training or other professional register, where registration is held
- The Police, where a criminal offence may have occurred
- HMRC, Action Fraud, the ICO or HSE as appropriate for specific misconduct types

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## 13. Records and Retention

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- Investigation, hearing and outcome records are retained for 6 years after the case is closed under the Data Retention and Disposal Policy or longer where law or the Awarding Organisation requires
- Written warnings are retained on the personal file for their 'spent' period and expire thereafter; they are not considered in future processes once spent (except for repeated pattern, where proportionate)
- Records are held securely and access is limited to those with a need to know

## 14. Timescales

Stage	Typical timescale
Acknowledgement of concern received	Within 3 calendar days
Investigation completed	Within 21 calendar days
Notice of hearing	Minimum 7 calendar days
Outcome communicated	Within 7 calendar days of the hearing
Appeal notice from individual	Within 7 calendar days of the outcome
Appeal heard	Within 21 calendar days of receipt of notice

## 15. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by changes to the ACAS Code, employment law or a significant case. All outcomes are recorded in the Version History at Section 17.

## 16. Related Documents

This policy should be read alongside:

- Staff Code of Conduct
- Safer Recruitment Policy
- Staff Induction Policy
- Grievance Policy
- Whistleblowing Policy
- Conflict of Interest Policy
- Anti-Bribery and Corruption Policy
- Equality, Diversity and Inclusion Policy
- Anti-Bullying and Harassment Policy
- Safeguarding and Prevent Duty Policy
- Data Protection and GDPR Policy
- Information Security and Cyber Security Policy
- Malpractice and Maladministration Policy
- Complaints Policy
- Appeals Policy

## 17. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	Supersedes the sanctions portion of the prior combined Staff Induction and Sanctions Policy dated 07/04/2026, now split into two standalone policies. Full ACAS Code alignment with investigation, hearing, outcome and appeal stages; distinct performance (capability) pathway; explicit gross-misconduct list; right to be accompanied; standard timescales; Alternative Contact route for cases involving the Centre Manager.

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## 18. Approval

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This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta  
Name

*P Mehta*  
Signature

22/04/2026  
Date