

EFI Group Staff Code of Conduct



Divisions:

- **Fashion Retail Academy**
- **London College of Beauty Therapy**
- **Education for Industry Training**

Last Reviewed September 2024

Next Review date September 2025

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Code of Conduct for Staff

This policy should be read in conjunction with other Education for Industry policies, particularly Safeguarding and Child Protection, Recruitment policies, Allegations of Abuse Against Staff, Whistleblowing, Behaviour, as well as the DfE publications, Keeping Children Safe in Education (KCSIE) 2024 and Working Together to Safeguard Children 2023. The Safer Recruitment Consortium's non-statutory May 2019 "Guidance for safer working practice for those working with children and young people in education settings" is also very helpful.

Making a Professional Judgment:

Members of staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge. The welfare of the students is paramount. Members of staff must always consider whether their actions are warranted, proportionate and safe and applied equitably. Staff should always act in the best interests of the students.

Power and Positions of Trust: All members of staff working with the students are in positions of trust. A relationship between a member of staff and a student cannot be a relationship between equals. Members of staff must always maintain appropriate professional boundaries and avoid behaviour, which might be misinterpreted by others. They must report and record any incident with this potential, including when coming into contact with students outside of working patterns: this should be reported to the Director of Student Services and Safeguarding as soon as is reasonably practical. It is an offence under section 16 of The Sexual Offences Act 2003 to abuse a 'position of trust' by having an intimate relationship with a student under any circumstances.

Propriety and Behaviour: All members of staff are expected to adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

Dress and Appearance: A person's dress and appearance are matters of personal choice and self-expression. However, all members of staff should dress in ways which are respectful, unprovocative and appropriate to their role.

Data Protection: All members of staff must abide by the Academy's Data Protection Policy. All personal information must be dealt with correctly, securely and in accordance with the General Data Protection Regulation (GDPR), and other related legislation.

Personal Living Space: No child or young person should be in or invited into, the home of a member of staff who works with them, unless the reason for this has been firmly established and agreed with parents or carers and a senior member of staff or the Designated Safeguarding Lead (DSL).

Gifts, Rewards and Favouritism: It is acknowledged that there are specific occasions when members of staff may wish to give a student a personal gift. This is only acceptable practice where the member of staff has first discussed the giving of

the gift and the reason for it with a senior member of staff and/or parent or carer and the action is recorded. Methods and criteria for selection should always be transparent and subject to scrutiny. There are occasions when students or their parents/carers wish to pass small tokens of appreciation to members of staff e.g. on special occasions or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value (gifts received worth more than £100 must be declared by telling the Academy Business Manager, as in the Academy's Anticorruption & Bribery Policy).

Infatuations: Occasionally, a student may develop an infatuation with a member of staff who works with them. Any member of staff, who becomes aware that a student is developing an infatuation, should discuss this at the earliest opportunity with a senior member of staff or the DSL and parent or carer so appropriate action can be taken to avoid any hurt, distress or embarrassment.

Communication with Children and Young People (including social media and the use of technology): Communication between students and members of staff, by whatever method, must take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text or other messaging, e-mails, digital cameras, videos, webcams, websites and blogs.

Members of staff must not share any personal information with any students. They must not request, or respond to, any personal information from the student, other than that which might be appropriate as part of their professional role. Members of staff must ensure that all communications are transparent and open to scrutiny. Members of staff must not give their personal contact details to students including e-mail, home or mobile telephone numbers, social media account details, unless there are exceptional circumstances in which the need to do so is agreed with a senior member of staff or the DSL. E-mail, text or social media messaging/communications between members of staff and students outside agreed protocols may lead to disciplinary and/or criminal investigations. This also includes communications through internet-based websites. Internal e-mail systems must be used only in accordance with the Groups's policies.

Social Contact: Members of staff should not seek to have social contact with students or their families/carers, unless the reason for this contact has been firmly established and agreed with a senior member of staff or the DSL and the parent or carers. They must report and record any incident with this potential, including when coming into contact with students outside of working patterns: this should be reported to the Director of Student Services and Safeguarding as soon as is reasonably practical.

Physical Contact: It is crucial that in all circumstances, members of staff only touch students in ways which are appropriate to their professional or agreed role and responsibilities. When physical contact is made with a student this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. If a member of staff believes that their action could be misinterpreted, or if an action is observed by another as being inappropriate or possibly abusive, the incident and circumstances must be reported to the DSL. Members of staff who work in certain settings, for

example creative activities may have to initiate some physical contact with students, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a student so they can perform an activity safely or prevent injury. Physical contact must only take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance must be reported to the DSL and parent or carer.

Behaviour Management: All students have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable in any situation. Any sanctions or rewards used must be part of the Group's Behaviour Policy.

Use of Control and Physical Intervention: The use of physical intervention must, wherever possible, be avoided and only used to prevent personal injury to themselves, another student or member of staff or to prevent serious damage to property. In all cases where physical intervention is employed the incident and subsequent actions must be documented and reported. This must include written and signed accounts of all those involved, including the student. The parents or carers of the student will be informed on the same day.

Intimate Care: All students have a right to safety, privacy and dignity when contact of a physical or intimate nature is required and depending on their abilities, age and maturity will be encouraged to act as independently as possible.

Personal Care: Students are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard students and/or satisfy health and safety considerations. This supervision will be appropriate to the needs and age of the students concerned and sensitive to the potential for embarrassment. Members of staff need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the students with whom they work.

First Aid and Administration of Medication: It is expected that members of staff working with students will be aware of basic first aid techniques. It is not, however, a contractual requirement and whilst members of staff may volunteer to undertake such tasks, they must be suitably trained and qualified before administering first aid and/or any agreed medication. When administering first aid, wherever possible, members of staff will ensure that another adult is aware of the action being taken. Parents/carers must always be informed when first aid has been administered for a head injury or where follow-up action is required.

In circumstances where students need medication regularly a health care plan will be established. The Group follows the statutory guidance in the DfE December 2015 guidance, "Supporting Pupils in Group with Medical Conditions". The key points are:

- Students in education with medical conditions should be properly supported so that they have full access to education, including Group trips.

- Governing bodies must ensure that arrangements are in place in Groups to support pupils at Group with medical conditions.
- Governing bodies should ensure that Group leaders consult health and social care professionals, pupils and parents to ensure that the needs of children with medical conditions are effectively supported.

One to One Situations: One to one situations have the potential to make a student more vulnerable to harm by those who seek to exploit their position of trust. Members of staff working in one to one settings with students may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised so that when one to one situations are unavoidable, reasonable and sensible precautions are taken. Meetings with students outside agreed working arrangements must not take place without the agreement with a senior member of staff or the DSL and parents or carers.

Home Visits: Under no circumstances will a member of staff visit a child or young person in their home outside agreed work arrangements or invite a student to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the member of staff must have a prior discussion with a senior member of staff or the DSL and the parents or carers and a clear justification for such arrangement is agreed and recorded.

Transporting Children and Young People: In certain situations, staff or volunteers may be required or offer to transport students as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks. Consideration must be given to the potential distraction of the driver and the supervision of the passengers. A judgement should be made about the likely behaviour and individual needs of the students. If any of them may require close supervision, then another adult should travel in the vehicle so that the driver is not distracted or compromised. Staff should not offer lifts to students unless the need for this has been agreed by a member of the Senior Team. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded. Staff should never offer to transport students outside of their normal working duties, other than in an emergency or where not doing so would mean the child or young person may be at risk. In these circumstances the matter should be recorded and reported to both the Senior Team and the student's parent(s)/carers before the journey takes place if at all possible.

Trips and Outings: Members of staff must take particular care when supervising students on trips and outings, where the setting is less formal than the usual workplace. Members of staff remain in a position of trust and need to ensure that their behaviour remains professional at all times and stays within clearly defined professional boundaries. Members of staff must ensure that all students in their care

are handed over to parents/carers at the end of the trip or outing unless agreed in writing in advance. In all circumstances, those organising trips and outings must pay careful attention to ensuring safe staff/student ratios and to the gender mix of staff especially on overnight stays.

Photography and Videos: Working with children and young people may involve the taking or recording of images. Any such work must take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of the students. Images should be stored on Group and not on staff personal devices. If a personal device is used to take the picture whilst on a trip or at an event, then it should be transferred to the Group's shared area and deleted from the personal device as soon as possible afterwards.

Access to Inappropriate Images and Internet Usage: There are no circumstances that will justify members of staff possessing indecent images of children. Members of staff must ensure that students are not exposed to any inappropriate images or web links. Members of staff need to ensure that internet equipment used by the students have the appropriate controls with regards to access e.g. personal passwords must be kept confidential. Where indecent images of children or other unsuitable material are found, the police and Local Authority Designated Officer will be immediately informed. Members of staff must not attempt to investigate the matter or evaluate the material themselves, as this may lead to evidence being contaminated, which in itself can lead to a criminal prosecution.

Female Genital Mutilation (FGM): Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or through evidence) that FGM appears to have been carried out on a girl under 18. Staff must activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. For more information see the Group's Safeguarding Policy.

Preventing Radicalisation: The Counter-Terrorism & Security Act 2015 (including the Prevent Duty Guidance 2015) places a duty on education and other childcare providers to have due regard to the need to prevent people from being drawn into terrorism. See the Group's Safeguarding Policy and Extremism & Radicalisation Policy. This duty applies to both children and adults.

Whistleblowing: Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Members of staff must acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of the students may be at risk. Members of staff who whistleblow should be aware that their employment rights are protected. See the Group's Whistleblowing Policy.

Review & Update: This policy will be reviewed annually.
It was updated in September 2024