



Staff Code of Conduct Policy

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Equality Impact			
Statement	<p>We welcome feedback on this document and the way it operates. We are interested to know of any possible or actual adverse impact that may affect any groups in respect of any of the Equality Act 2010 protected characteristics.</p> <p>The person responsible for equality impact assessment for this document is the Director of Equality and Diversity.</p>		
Screening	<p>This document has been screened by the Equality Team and the impact has been assessed as:</p> <p> <input type="checkbox"/> Not applicable <input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High </p>		

1. Purpose

- 1.1. Trustees realise that the vast majority of adults who work with young people in our Group act professionally and seek to provide a safe and supportive environment which secures the well-being and very best outcomes for the young people in their care.
- 1.2. Trustees rightly expect the highest standards of conduct from all employees of the New Bridge Group
- 1.3. This Staff Code of Conduct draws together existing laws, regulations and conditions of service to guide employees in their day to day work.
- 1.4. The Staff Code of Conduct should be read alongside policies/guidance in place at the New Bridge Group detailed as “required reading”.

2. Scope of Policy

- 2.1. This Code of Conduct sets out the Group’s requirements of its employees. However, all those carrying out work for or on behalf of the Group, including governors, temporary workers, interim staff, consultants, business partners and contractors are also required to adhere to the principles of the code.
- 2.2. The Group’s disciplinary procedure aligns with this code of conduct. Failure to observe any of the standards in the code of conduct may lead to disciplinary action which could result in dismissal.
- 2.3. Breaches of the code by workers who are not directly employed by New Bridge Group may be referred to their employer and they may be stopped from working for the Group with immediate effect. The Group may reconsider its contractual relationship with contractors/agencies who do not take appropriate action in the event that their workers breach the standards expected in this code.
- 2.4. Breaches of the code by trustees/governors will be dealt with in accordance with the Governance Regulations.

3. Reason for Review

- 3.1. This policy was reviewed as part of a Group audit.

4. Aim(s)

- 4.1. The Code of Conduct is intended to ensure that all those working for the Group are aware of the standards expected of them and/or the Group, specifically that they do not commit and are not open to allegations of inappropriate behaviour, favouritism, abuse of authority or conflict of interest. The Code of Conduct and the associated guidelines should be read in conjunction with the Guidance to Schools relating to acceptable use of Group monies and the seven principles of public life, known as the Nolan Principles.
- 4.2. Governors/trustees are expected to observe the requirements of the Group’s Scheme of Delegation in addition to the Code of Conduct. Teachers are also required to comply with the Personal and Professional Conduct requirements laid down in the Department for Education’s most recent Teachers’ Standards document in addition to the Code of Conduct.

5. Procedures and practice

- 5.1. **Compliance with the Code of Conduct**

- 5.1.1. As an employee of the New Bridge Group you are expected to give the highest possible standard of service. Where it is part of your duties, you should provide appropriate advice.
- 5.1.2. The Code of Conduct forms part of an employee's contract. Failure to comply with it and with the associated New Bridge Group policies may result in disciplinary action being taken and the trustees reserve the right to take legal action against employees where serious breaches of the Staff Code of Conduct warrant such action.
- 5.1.3. If you have reason to believe that a fellow employee is in breach of this Staff Code of Conduct you must disclose the information using the Whistleblowing policy.
- 5.1.4. New Bridge Group takes any allegations relating to fraud, corruption or breaches of this Staff Code of Conduct very seriously. If substantiated after investigation they will be dealt with by the New Bridge Group's Disciplinary Policy and Procedures, and may be referred to the police.
- 5.1.5. Equally, abuse of this process by raising unfounded or malicious allegations would also be treated as a disciplinary matter.

5.2. **Duty of Care**

- 5.2.1. All staff are accountable for the way in which they exercise authority, manage risk, use resources and protect young people from discrimination and avoidable harm.
- 5.2.2. All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from sexual, physical and emotional harm. Young people have a right to be safe and to be treated with respect and dignity. It follows that staff are expected to take reasonable steps to ensure the safety and well-being of young people. Failure to do so may be regarded as professional neglect.
- 5.2.3. The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and young people and behaviour by staff that demonstrates integrity, maturity and good judgement.
- 5.2.4. When individuals accept a role within the New Bridge Group that involves working with young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.
- 5.2.5. Trustees have a duty of care towards their employees under the Health and Safety at Work Act 1974 which requires them to provide a safe working environment for staff and guidance about safe working practices. Thus, Trustees have a duty of care for the well-being of employees and to ensure that employees are treated fairly and reasonably in all circumstances. Staff who are subject to an allegation will therefore be supported and the principles of natural justice applied.

5.2.6. The Health and Safety Act 1974 also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. The trustees' duty of care and the staff duty of care towards young people should not conflict. This 'duty' can be demonstrated through the use and implementation of this Code of Conduct.

5.2.7. The trustees of the New Bridge Group control the use of the premises both during and outside school hours. Where the trustees of the New Bridge Group provide services or activities directly under the supervision or management of school staff, the organisation's arrangements for safeguarding will be followed.

5.3. Exercise of Professional Judgement

5.3.1. This Staff Code of Conduct cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour that is illegal, inappropriate or inadvisable. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the young person in their charge.

5.3.2. Staff should always consider whether their actions are warranted, proportionate, and safe and applied equitably.

5.4. Power and Positions of Trust

5.4.1. As a result of your knowledge, position and/or the authority invested in your role, all staff working with young people at the New Bridge Group are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

5.4.2. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

5.4.3. Where a person aged 18 or over is in a position of trust with a young person under 18, it is an offence for that person to engage in sexual activity with or in the presence of that young person, or to cause or incite that young person to engage in or watch sexual activity.

5.5. Disclosure of Information

5.5.1. The New Bridge Group acknowledges and will comply with the laws which require that certain types of information must be available to the

public, service users, councillors, government departments and auditors.

5.5.2. Staff should ensure that they know the information which has voluntarily been made open and to whom. Staff should also ensure they know information which is not to be disclosed without specific permission. If unsure about the status of the information you are using, you must clarify it with your line manager or senior member of staff.

5.5.3. Staff must not use any information obtained in the course of their work for personal gain or benefit, or for political advantage. Staff must not pass information onto others who might use it in any of these ways.

5.6. Confidentiality

5.6.1. Staff may have access to confidential information about young people in order to undertake their everyday responsibilities. In some circumstances staff may be given highly sensitive or private information. They should never use confidential or personal information about a young person or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the young person.

5.6.2. Confidential information about a young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the young person's identity does not need to be disclosed the information should be used anonymously.

5.6.3. There are some circumstances in which a member of staff may be expected to share information about a young person, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated responsibilities for child and vulnerable adult protection.

5.6.4. If a member of staff is in any doubt about whether to share information or keep it confidential, he or she should seek guidance from a senior member of staff. Any media or legal enquiries should be passed to senior management.

5.6.5. The storing and processing of personal information about young people is governed by the Data Protection Act 1998. Trustees have clear advice to staff about their responsibilities under this legislation.

5.6.6. Confidential information about staff should never be used casually in conversation or shared with any person other than on a need-to-know basis.

5.7. Recruitment and Other Employment Matters

- 5.7.1. Staff involved in recruitment must decide them on the basis of merit. It is illegal to do otherwise.
- 5.7.2. These principles and procedures are detailed within the New Bridge Group's Recruitment, Assessment and Selection and Appointment (RASA) policy. Staff must not be involved in recruitment if they are related to an applicant or have a close personal relationship outside work with the applicant.
- 5.7.3. Similarly staff must not be involved in decisions relating to discipline, promotion or pay adjustments for any employee with whom they have a close relationship.

5.8. Outside commitments which may conflict with your contract

- 5.8.1. Whatever your pay grade you must not undertake additional work (paid or unpaid) if it compromises your work or overlaps with it in some way, or if, to do that work, you would rely on access to knowledge/materials gained through your work for the New Bridge Group.
- 5.8.2. Staff paid on teachers' pay and conditions or those paid above Scale 6 (above SCP 28 or 29 pro rata) must obtain specific prior written consent from the CEO or Head of Site before taking an additional appointment or any other work outside of your contract with the New Bridge Group. If you are concerned you fit into either of these categories, you must disclose it immediately to the HR Manager.
- 5.8.3. When any proposed additional employment, work or business conflicts with the interests of New Bridge Group the request will be refused.
- 5.8.4. In the context of above, it is clear that you must not undertake outside work or activity for a personal gain in the work place. You must not use facilities, equipment, materials or typing/computer facilities for these or other non-work related purposes unless permission has been received from the CEO or Head of Site.

5.9. Equality & Diversity

- 5.9.1. All staff within the New Bridge Group are expected to treat people fairly and with respect irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation

5.10. Personal & Business Interests

- 5.10.1. All staff employed by the New Bridge Group must declare if they have any personal or business interests which could cause conflict between you as the employee and the New Bridge Group as the organisation.

- 5.10.2. All personal and business interests will be recorded. When in doubt, you must declare the interest at the earliest opportunity. Failure to do so is a disciplinary matter and may result in dismissal. Please refer to the Business Interests Policy

5.11. Behaviour during the tendering process

- 5.11.1. If you work in a procurement role you must be fair and impartial in all your dealings.
- 5.11.2. Information on tenders or costs of internal or external contractors is confidential and must not be disclosed.

5.12. Gifts, Rewards and Favouritism

- 5.12.1. Staff should be aware of the New Bridge Group's policy on Gifts and Hospitality including the arrangements for the declaration of gifts received.
- 5.12.2. It is against the law for staff to take bribes. Staff need to take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.
- 5.12.3. There are occasions when young people or families wish to pass small tokens of appreciation e.g. at Christmas or as a thank-you and this is acceptable. However, staff must adhere to the policy in place and know that it is unacceptable to receive gifts on a regular basis or of any significant value. If you are unsure, please seek advice from senior management.
- 5.12.4. Similarly, it is not advisable to give such personal gifts to young people. This could be misinterpreted as a gesture either to bribe, or single out the young person. Any reward given to a young person should follow the agreed practice within the organisation, consistent with the behaviour policy, be recorded and not based on favouritism.

5.13. Care of New Bridge Group money

- 5.13.1. If your work requires you to handle New Bridge Group money, you must handle this responsibly and lawfully, and comply with the organisation's rules and procedures.
- 5.13.2. Staff must use the care and economy you would use for your own money to secure value for money and avoid legal challenges.

5.14. Fraud, Theft, Bribery and Corruption

- 5.14.1. The New Bridge Group has a zero-tolerance approach to fraud, theft, bribery and corruption and is committed to ensuring that effective arrangements are in place to prevent, detect, investigate and report fraud. Where a fraud is found to have been committed by any member

of staff or other person, the trustees will take the appropriate disciplinary and/or legal action.

5.15. Sponsorship

- 5.15.1. All sponsorship must be formally approved by the CEO.
- 5.15.2. Giving sponsorship - when you propose for New Bridge Group to sponsor an event or service, you, your partner, spouse or relative must not benefit from the sponsorship directly. Also when through sponsorship, grant aid, financial or other means, the New Bridge Group gives support, you must ensure that impartial advice is given and no conflicts of interest are involved.
- 5.15.3. Receiving sponsorship - if an organisation approaches you to sponsor or is seeking to sponsor a New Bridge Group activity by invitation, tender, negotiation or voluntarily, New Bridge Group's requirements apply for competition, tendering and contracting of that sponsorship, so too does the Code of Conduct's requirements on gifts and hospitality. Particular care must be taken when dealing with current or potential contractors.

5.16. Use of New Bridge Group Facilities

- 5.16.1. In general, you must not use New Bridge Group owned facilities, property or equipment for your own personal use (or for any other work including charity or voluntary work) or employment unless you have been given permission by the Head of Site or the CEO. This includes the use of computers and the internet/email facilities, although New Bridge Group does authorise the use of this in non-working times for all staff (see section 13).
- 5.16.2. The facilities of telephone usage and photocopying are available on a reasonable basis of limited use in exchange for payment. The Business Team will be able to give you current costs.

5.17. Conduct outside work

- 5.17.1. Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the New Bridge Group or the employee's own reputation or the reputation of other members of the community. Any such conduct could lead to dismissal.
- 5.17.2. Criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct would be regarded as unacceptable and could lead to dismissal.
- 5.17.3. Staff should not establish or seek to establish social contact with young people for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff

should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued as grooming. This also applies to social contacts made through outside interests or the staff member's own family.

5.17.4. It is recognised that staff can support a parent who may be in particular difficulty. Care needs to be exercised in those situations where the parent comes to depend upon the staff member for support outside their professional role. This situation should be discussed with senior management and where necessary referrals made to the appropriate support agency.

5.17.5. Your off-duty hours are your own personal concern but again, actions outside work must not compromise your contact with the New Bridge Group.

5.18. Using Technology & Social Media

5.18.1. Staff must exercise caution when using information technology and be aware of the risks to themselves and others. This includes the wider use of technology such as mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites and blogs. The Group's E-safety policy must be adhered to.

5.19. Photography, Videos and other Creative Arts

5.19.1. Many activities within the New Bridge Group may involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity or to celebrate achievement.

5.19.2. Staff should refer to the Total E-safety policy for further information on taking and using digital images and acceptable use of social networking.

5.20. Personal mobiles

5.20.1. Staff are not permitted to use mobile phones during working time unless formal arrangements have been made.

5.20.2. A member of staff's personal mobile phone may be designated as the means of communication for specific activities e.g. on school trips. The use of mobile phones by staff whilst on school duties must respect national legislation and common courtesies. For example, they must not be used whilst driving and should be switched to silent at events and venues where this is expected

5.20.3. It is recognised that mobile phones provide direct contact to others, and at times provide a necessary reassurance due to their ease of access, particularly at stressful times. Staff, therefore, in agreed exceptional circumstances, are permitted to keep the volume of their phone switched on. This is to enhance their own well-being and peace of

mind, to reduce stress and worry and to enable them to concentrate far more effectively on their work. Such use will be for an agreed limited period only, until any concerns or issues leading to the exceptional circumstance request have been resolved.

5.21. Communication with Pupils & Parents

- 5.21.1. Communication with young people, by whatever method, should take place within professional boundaries and staff should avoid any personal subject matter.
- 5.21.2. Staff should be mindful in their communications with young people so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
- 5.21.3. Staff should not give their personal contact details to young people including email, home or mobile telephone numbers unless the need to do so is agreed with senior management. Internal email systems should only be used in accordance with New Bridge Group policy

5.22. Dress and Appearance

- 5.22.1. A person's dress and appearance are matters of personal choice and self-expression. However, staff should consider the manner of dress and appearance appropriate to their professional role which may be different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which is considered as inappropriate or unsafe by senior management could be asked to modify their appearance.

5.23. Drugs and alcohol

- 5.23.1. The taking of illegal drugs is unacceptable and will not be tolerated. All staff are expected to attend work without being under the influence of alcohol or illegal drugs and without their performance being adversely impacted by the consumption of alcohol or illegal drugs.
- 5.23.2. If alcohol or drug usage impacts on a staff member's working life, the organisation has the right to discuss the matter with the employee and take appropriate action.

5.24. Criminal actions

- 5.24.1. All staff must inform the CEO immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution. The CEO will discuss this with the member of staff in the context of their role and responsibilities in order to safeguard the young people and other employees of the New Bridge Group.

5.25. Harassment & Bullying

- 5.25.1. Trustees will not tolerate harassment and bullying at work.

5.26. Smoking

- 5.26.1. To comply with legislation, and in seeking to make our organisation a pleasant and healthy environment for all, the New Bridge Group operates a ban on smoking (including E-cigarettes) in all its premises.
- 5.26.2. Smoking (including E-cigarettes) is permitted only in open spaces well away (a minimum of four metres) from our buildings and entrances and windows.

5.27. Attendance & Timekeeping

- 5.27.1. All staff are required to comply with the New Bridge Group's policy in relation to notification of absence and timekeeping. All staff must sign in and out when entering or leaving any of our premises using their allocated identity badge.
- 5.27.2. There is an expectation at the New Bridge Group that all staff will arrive at their workplace ready and prepared in plenty of time to commence their duties, and there is an expectation that staff do not leave the building at the same time as the young people at the end of the school day.
- 5.27.3. Staff must obtain authorisation from the HR department if for any reason they wish to arrive later or leave earlier than their agreed start and finish times.
- 5.27.4. Trustees reserve the right not to pay employees in respect of working time lost because of poor timekeeping.
- 5.27.5. Persistent poor timekeeping may result in disciplinary action.

5.28. Relationships between staff members

- 5.28.1. Although the existence of a personal relationship between members of staff does not necessarily constitute a bar to the employment or promotion of either party, staff should declare to the CEO any personal relationships which may give rise to a real or perceived conflict of interest, trust or breach of confidentiality.
- 5.28.2. Where a personal relationship exists or develops with members of staff who are in a line management or supervisory role at work, they must not be involved in recruitment, selection, appraisal, promotion or in any other management activity process involving the other party. Additionally, staff in a personal relationship should not work together in any circumstance whereby a conflict of interest, breach of confidentiality or unfair advantage may be perceived to be gained from the overlap of a personal and professional relationship. In any such circumstances, the relationship must be declared, in confidence, to the CEO.

5.29. Infatuations

- 5.29.1. Staff need to be aware that it is not uncommon for young people to be strongly attracted to a member of staff and/or develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.
- 5.29.2. Staff who become aware that a young person may be infatuated with themselves or a colleague, should discuss this at the earliest opportunity with the Head of Site so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

5.30. Physical Contact

- 5.30.1. There are occasions when it is entirely appropriate and proper for staff to have physical contact with young people, but it is crucial that they only do so in ways appropriate to their professional role.
- 5.30.2. A 'no touch' approach is impractical for most staff and will in some circumstances be inappropriate. When physical contact is made with young people 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.
- 5.30.3. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should, therefore, use their professional judgement at all times.
- 5.30.4. Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible in the Group's incident book and, if appropriate, a copy placed on the young person's file.
- 5.30.5. Physical contact which occurs regularly with an individual young person is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to young people with SEN or physical disabilities). Any such contact should be the subject of an agreed and open Group policy and subject to review. Where feasible, staff should seek the young person's permission before initiating contact. Staff should listen, observe and take note of the young person's reaction or feelings and - so far as is possible - use a level of contact and/or form of communication which is acceptable to the young person for the minimum time necessary.

- 5.30.6. Extra caution may be required where it is known that young person has suffered previous abuse or neglect. In the young person's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse. It is recognised that many such young people may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively by helping them to understand the importance of personal boundaries.
- 5.30.7. The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child. Young people with special needs may require more physical contact to assist their everyday learning. The arrangements should be understood and agreed by all concerned, justified in terms of the young person's needs, consistently applied and open to scrutiny.
- 5.30.8. Some staff, for example, those who teach PE and games, or who offer music tuition will, on occasions, have to initiate physical contact with young people in order to support them so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the young person's agreement.
- 5.30.9. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the young person.

5.31. Showers and Changing

- 5.31.1. Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.
- 5.31.2. Staff need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the young person.

5.32. Intimate Care

- 5.32.1. All young people have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan should be drawn up and agreed with parents for all young people who require intimate care on a regular basis.

5.32.2. Young people should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

5.32.3. Additional vulnerabilities that may arise from a physical disability or learning difficulty should be considered with regard to individual teaching and care plans for each young person. As with all arrangements for intimate care needs, agreements between the young person, their parents/carers and the organisation must be negotiated, agreed and recorded. In addition, the views and/or emotional responses of young people with special educational needs, regardless of age and ability, must be actively sought in regular reviews of these arrangements.

5.33. Young People in Distress

5.33.1. There may be occasions when a distressed young person needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation

5.33.2. Where a member of staff has a particular concern about the need to provide this type of care and reassurance, s/he should seek further advice from a senior manager.

5.34. Behaviour Management

5.34.1. All young people have a right to be treated with respect and dignity. Equally, staff should not use any form of degrading treatment to punish a young person. The use of humour can help to defuse a situation. The use of sarcasm, demeaning or insensitive comments towards a young person is not acceptable in any situation.

5.35. Care, Control and Physical Intervention

5.35.1. The circumstances in which staff can intervene with a young person are covered by the 1996 Education Act. Staff may legitimately intervene to prevent a young person from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others. Any form of physical intervention should only be used as a last resort and within an holistic framework incorporating a wide range of de-escalation and behaviour management strategies.

5.35.2. This is a complex area and staff must have regard to DfE, BUILD and Team Teach guidance. Team Teach training is compulsory for all staff within the organisation and staff must adhere to the organisation's restrictive physical intervention policy.

- 5.35.3. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.
- 5.35.4. In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be documented and reported

5.36. Sexual Contact

- 5.36.1. Any sexual behaviour by a member of staff with or towards a young person is both inappropriate and illegal. Young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the young person consents or not. This includes the prohibition on adults in a position of trust.
- 5.36.2. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing a young person to engage in or watch sexual activity or the production of pornographic material. 'Working Together to Safeguard Children' defines sexual abuse as "forcing or enticing a young person to take part in sexual activities, whether or not the young person is aware of what is happening".
- 5.36.3. There are occasions when adults may embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a young person, and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a young person might be construed as being part of a 'grooming' process, which is an offence.

5.37. One to One Situations

- 5.37.1. Staff working in one to one situations with young people may be more vulnerable to allegations. Everyone should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and the young person are met.
- 5.37.2. The trustees of the New Bridge Group will consider these issues in drawing up their policies and offer clear training and guidance for the use of any areas of the premises which place staff or young people in vulnerable situations e.g. photographic darkrooms, counselling rooms etc.
- 5.37.3. Senior management will undertake a risk assessment in relation to the specific nature and implications of one to one work for each worker. In addition, each assessment should take into account the individual

needs of each young person. Any arrangements should be reviewed on a regular basis.

- 5.37.4. Pre-arranged meetings with young people away from any of our premises should not be permitted unless approval is obtained from their parent and the CEO or Head of Site or other senior colleague with delegated authority.

5.38. Home Visits

- 5.38.1. Appropriate policies and related risk assessments are in place to safeguard both staff and young people, who can be more vulnerable in these situations. A risk assessment will include an evaluation of any known factors regarding the young person, parents and others living in the household. Where little or no information is available, visits should not be made alone. Emergency situations should be immediately reported to the Head of Site, police or social care as appropriate.

5.39. Transporting Young People

- 5.39.1. In certain situations e.g. out of school activities, staff may agree to transport young people. A designated member of staff should be appointed to plan and provide oversight of all transporting arrangements and respond to any difficulties that may arise.
- 5.39.2. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one member of staff additional to the driver acting as an escort.
- 5.39.3. 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 capacity is not exceeded.

5.40. Educational Visits and After School Clubs etc.

- 5.40.1. Staff should take particular care when supervising young people in the less formal atmosphere of a residential setting or after-school activity.
- 5.40.2. During activities that take place off the school site or out of school hours, a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.
- 5.40.3. Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Young people, staff and parents should be informed of these prior to the start of the trip.

- 5.40.4. Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity. Staff must be aware of and follow guidance.

5.41. First Aid and Administration of Medication

- 5.41.1. New Bridge Group has a team of trained and appointed first-aiders. Teachers may volunteer to undertake this task but it is not a contractual requirement. Staff should receive appropriate training before administering first aid or medication.
- 5.41.2. Young people may need medication during school hours. In circumstances where young people need medication regularly a health care plan should be drawn up to ensure the safety and protection of the young person and staff. The Administering Medication and Use of Inhalers policies should be referred to.
- 5.41.3. If a member of staff is concerned or uncertain about the amount or type of medication being given to a young person, this should be discussed with the Director of Care at the earliest opportunity. When administering first aid, wherever possible, staff should ensure that another member of staff is present, or aware of the action being taken. Parents should always be informed when first aid has been administered.
- 5.41.4. There should be due regard to DfE guidance.

5.42. Curriculum

- 5.42.1. Many areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 5.42.2. The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to a young person's questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff.
- 5.42.3. Care should also be taken to abide by the governing body's required policy on sex and relationships education and the wishes of parents. Parents have the right to withdraw their young person from all or part of any sex education provided (but not from the biological aspects of human growth and reproduction necessary under the Science curriculum)

5.43. Whistleblowing

5.43.1. Staff should 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 young people may be at risk. The Group's Whistleblowing policy should be referred to.

5.44. Sharing Concerns and Recording Incidents

5.44.1. All staff should be aware of the New Bridge Group's child protection and vulnerable adult procedures, including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association.

5.44.2. In the event of an incident occurring which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to senior staff. Early discussion with a parent or carer could avoid any misunderstanding.

5.44.3. Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with young people so that appropriate support can be provided or action can be taken.

5.44.4. It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of staff working with or on behalf of young people.

5.44.5. Health & Safety

5.44.5.1. All staff must adhere to the New Bridge Group's Health & Safety Policy, procedure and guidance and must ensure that they take every action to keep themselves and everyone in the organisation safe and well. This includes taking immediate safety action in a potentially harmful situation either at school or off-site.

6. Other useful documents

- 6.1. Data Protection Policy
- 6.2. E-Safety Policy
- 6.3. Disciplinary Policies and Procedures
- 6.4. Dignity at Work (Harassment and Bullying) Policy
- 6.5. Equality Impact Scheme
- 6.6. Seven principles of Public Life, the Nolan Principles
- 6.7. Scheme of Delegation
- 6.8. Teachers' Standards. Personal & Professional Conduct
- 6.9. Whistleblowing policy
- 6.10. Administering Medication policy
- 6.11. Use of Inhalers
- 6.12. Business Interests Policy

7. Monitoring

7.1. This policy will be monitored through the Group's accountability framework.