



Staff Code of Conduct Policy

Published: October 2024

Completed by: Rebecca Freeman

Reviewed: Rebecca Freeman 03/09/2025

Next Review Date: 21/07/2026

Illuminate AP Staff Code of Conduct

This code of conduct is to be adhered to at all times by all Illuminate AP staff members. It is to be used in conjunction with the Employee Handbook and the current Keeping Children Safe in Education Guidance and is based upon recommendations from the Safer Recruitment Consortium Guidance, February 2022.

This policy should be read in conjunction with all other Illuminate AP Policies, and where staff are unclear on their position within each area stipulated below, they are advised to refer to the specific policy that the area of conduct relates to.

It is recognised that the vast majority of adults who work with children act professionally and aim to provide a safe and supportive environment which secures the well-being and very best outcomes for children in their care. Achieving these aims is not always straightforward, as much relies on child and staff interactions where tensions and misunderstandings can occur. This document aims to reduce the risk of these by providing a Code of Conduct for staff to adhere to.

Underpinning principles

- The welfare of the child is paramount.
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils.
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way including self-reporting on CPOMS Staff Safe if their conduct or behaviour falls short of these guiding principles.
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.
- Staff should discuss and take advice promptly from their line manager if they have acted in a way which may give rise to concern.
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS).
- Staff and managers should continually monitor and review practice to ensure this guidance is followed.

1. Introduction

Adults have a crucial role to play in the lives of children. This Code of Conduct has been produced to help Illuminate AP staff establish the safest possible provision environments which safeguard children and reduce the risk of staff being falsely accused of improper or unprofessional conduct.

2. Responsibilities

Staff are accountable for the way in which they exercise authority; manage risk; use resources; and safeguard children. All staff have a responsibility to keep pupils safe and to protect them from abuse (sexual, physical and emotional), neglect and extra-familial harm. Pupils have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.

3. Making Professional Judgements

Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the pupils in Illuminate AP Provisions and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager. Adults should always consider whether their actions are warranted, proportionate, safe, and reasonable.

4. Power and Positions of Trust and Authority

Illuminate AP staff, as a result of their employment, hold a position of trust, authority and responsibility in relation to all pupils in their provisions. The relationship between a person working with children is one in which the adult has a position of power or influence. It is vital for adults to understand this power; that the relationship is not one between equals and the responsibility they must exercise as a consequence. The potential for exploitation and harm of vulnerable pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report any such incident to a senior manager and on CPOMS Staff Safe. Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

5. Confidentiality

The storing and processing of personal information is governed by the General Data Protection Regulations UK (GDPR) and Data Protection Act 2018. Illuminate AP Staff may have access to personal data about pupils and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interest of the child. Records should only be shared with those who have a legitimate professional need to see them. Staff should never share confidential or personal information about a pupil 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 child. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities or to statutory services. If a child or their parent or carer makes a disclosure regarding abuse or neglect, the member of staff must always take any such concerns seriously and record all interactions on CPOMS. Staff should never promise confidentiality to a child or parent but should give reassurance that the information will be treated sensitively. If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Designated Safeguarding Lead. For further guidance on this please see Illuminate AP's Child Protection and Safeguarding Policy and GDPR Policy.

6. Standards of Behaviour

All Illuminate AP staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct to maintain confidence and respect of the general public and those with whom they work. There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or children or adults in the community. Staff should be aware that their behaviour, either in or out of the workplace, could compromise their position within Illuminate AP in relation to the protection of children, loss of trust and confidence, or bringing Illuminate AP into disrepute.

Illuminate AP staff must declare any relationship or association, either in the real world or online, that may impact on their ability to safeguard students. Staff must also declare any relationship or association with students, parents or carers. Any concerns must be recorded on CPOMS Staff Safe.

Illuminate AP staff should wear their uniform, as provided to them, at all times during their working hours. A person's personal appearance is personal choice and self-expression, and some individuals will wish to exercise their own cultural customs. Staff should ensure that their uniform is compliant with their duties and that it fits appropriately to maintain decency.

Illuminate AP staff are encouraged to self-report via CPOMS Staff Safe and to alert management to any concerns about their colleague's conduct. There is an option for staff to report any concerns anonymously if they so wish to do so. For further clarification please see the Low-Level Concerns Policy, Whistleblowing Policy and Managing Allegations Policy.

7. Gifts and Rewards

Illuminate AP 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. There are occasions when students and their parents or carers wish to pass small tokens of appreciation to staff; for example, at Christmas 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. It is not permitted for Illuminate AP staff to give personal gifts to pupils or their families. This is to avoid any innocent gestures being viewed as either a bribe or to groom. It might also be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be earned, age appropriate and consistent with the provision reward scheme. Any reward activity should take place during the child's scheduled attendance pattern. Any rewards given are not based on favouritism.

8. Infatuations

All Illuminate AP staff need to recognise that it is not uncommon for pupils to be attracted to a member of staff or develop a 'crush' or infatuation. Staff should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted. Any member of staff who receives a report, overhears something, or otherwise notices any sign, however small or seemingly insignificant, that a young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this on CPOMS Staff Safe and alert the colleague in question to their concerns. In this way appropriate early intervention can be taken which can prevent escalation, increase awareness, and avoid hurt, embarrassment or distress for those concerned.

If necessary and proportionate, Senior Illuminate AP Staff will consider the circumstances where the staff member, pupil and their parents or carers should be spoken to and should ensure a plan to manage the situation is put in place. This plan should respond sensitively to the child and staff member and maintain the dignity of all. This plan should involve all parties, be robust and regularly monitored and reviewed.

9. Social Contact outside of the workplace

It is acknowledged that Illuminate AP staff may have genuine friendships and social contact with parents or carers of pupils, independent of the professional relationship. All staff are advised and encouraged to share any personal relationships with students or their parent or carer on the child's admittance to Illuminate AP. A plan can then be put in place to safeguard the member of staff if necessary or schedules can be accommodated to avoid staff directly working with those children and their parents or carers that they have prior, established relationships with.

All staff are aware that professionals who sexually harm children often seek to establish relationships and contact outside of the safe environment of a provision, with both the child and their parents, in order to 'groom' the adult and the child and potentially create opportunities for abuse. It is also important to recognise that social contact may provide opportunities for any type of grooming, such as for the purpose of sexual exploitation or radicalisation. Staff should recognise that some types of social contact with pupils or their families could be perceived as harmful or exerting inappropriate influence on children, and may bring Illuminate AP into disrepute (e.g., attending a political protest, circulating propaganda). If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in that moment and then self-report via CPOMS Staff Safe. This also applies to social contacts made through outside interests or the staff member's own family. Some staff may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the staff member or seeks support outside of their professional role this should be discussed with senior management and where necessary referrals made to the appropriate support agency.

10. Communication with Children

Staff should ensure that they establish safe and responsible online behaviours, working in accordance with other Illuminate AP policies which detail how new and emerging technologies may be used. Communication with children both in the real world and through web based and telecommunication interactions, should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chatrooms, forums, blogs, websites, gaming sites, digital cameras, videos, webcams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.)

Illuminate AP Staff should not request or respond to any personal information from children other than which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'. Staff should not give their personal contact details to children for example, e-mail address, home or mobile telephone numbers, details of web-based identities. If children locate these by any other means and attempt to contact or correspond with the staff member, the adult should not respond and must report the matter to their manager. The child should be firmly and politely informed that this is not acceptable.

Illuminate AP Staff should adhere to Illuminate AP policies, regarding communication with parents and carers and the information they share when using the internet. All staff are advised to have private social media profiles and those who have public profiles must be vigilant with users who are able to view these and must not post any inappropriate content or personal details online.

Certain members of staff will be provided with devices where they can communicate with students and parents or carers for work purposes only. These devices and their communication capabilities should not be abused by staff and staff must surrender these devices to senior management on request, should any concerns about their conduct whilst using these is called into question.

11. Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, however it is crucial that they only do so in ways appropriate to their professional role and in relation to the pupil's individual needs. Not all children feel comfortable about certain types of physical contact; this should be recognised and, wherever possible, adults should seek the pupil's permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some pupils are more comfortable with touch than others and may be more comfortable with touch from some adults than others. Staff should listen, observe and take note of the child's reaction or feelings and so far, as is possible, use a level of contact or form of communication which is acceptable to the pupil. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil, in one set of circumstances, may be inappropriate in another, or with a different child.

Any physical contact should be in response to the child's needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should, therefore, use their professional judgement at all times. 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 by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the manager and recorded on CPOMS Staff Safe. Where appropriate, management may consult with the Local Authority Designated Officer.

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. They also should recognise that these pupils may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries. Illuminate AP believe that all staff should adopt the principles of 'safe touch'. Staff should be aware that any well-intentioned

physical contact may be misconstrued by the child, their parents or carers and other colleagues.

In activities where staff may need to initiate physical contact to support children, for example when managing a child's health or care needs or supporting them during a sporting activity, there must be a risk assessment in place for that individual and activity. Physical contact should take place only when it is necessary in these situations and must take place under supervision of other staff members. Any intimate care needs should be undertaken in accordance with Illuminate AP's Intimate Care Policy and recorded.

It is good practice that all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers and pupils informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising. Illuminate AP adopt the principles of PRICE when using any physical intervention with students in accordance with the Physical Intervention Policy.

12. Sexual Contact

Any sexual behaviour by a member of staff with, or towards, a pupil is unacceptable. Sexual behaviour includes but is not limited to, any form of communication which may be considered sexually suggestive, such as comments, letters, email or social media interactions, phone calls, text messages or physical contact. It is an offence for a member of staff in a position of trust to engage in sexual activity with a pupil under 18 years of age and sexual activity with a child could be a matter for criminal and disciplinary procedures. Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. Sexual activity involves physical contact, including penetrative and non-penetrative acts, however it also includes non-contact activities, such as causing pupils to engage in or watch sexual activity or the production of pornographic material. There are occasions when adults embark on a course of behaviour known as 'grooming' where the purpose is to gain the trust of a child and manipulate the relationship so that sexual abuse can take place. All staff have a responsibility to always report to a senior manager any concerns about the behaviour of a colleague or any other professional they may meet in their line of work with Illuminate AP.

13. Home Visits and Lone Working

Staff working in one-to-one situations with pupils away from the provision environment can be more vulnerable to allegations or complaints. Illuminate AP staff should ensure that they adhere to the Lone Worker Policy when working 1-1 with a child outside of the provision environment. All staff must have good knowledge of the child that they are working with and be fully briefed on the child's personal circumstances and vulnerabilities in accordance with GDPR regulations.

Arranging to meet students outside of normal working hours is not permitted unless absolutely necessary and when approval has been given by senior management where the situation has been risk assessed and written permission has been granted by parents or carers.

All work with pupils and parents should usually be undertaken within the provision. However, there are occasions, in response to an urgent, planned or specific situation or job role, where it is necessary to make one-off or regular home visits. It is essential that these are planned where possible, and that staff are in communication with their line manager before and after the visit. Illuminate AP may be required to undertake welfare visits on behalf of schools or other agencies. When staff visit children at home, they must ensure a parent or carer aged over 18 is present before they enter the address. Children must be appropriately dressed for the visit and co-operative. Staff have the right to refuse to do anything outside of their own personal comfort on a home visit and do not have any legal rights to enter a child's home. If staff have significant concerns whilst on a home visit, they must report this to the DSL as soon as possible, so that these can be referred on to other agencies if required.

14. Transporting Pupils

Staff with the relevant insurance and driving permissions may be required to transport students as part of their job role. Staff should not offer lifts to pupils outside of their individual timetabled hours without permission from senior management. A daily transport plan for those students who require transport by provision staff will be put in place by management and must be adhered to. Those staff without the relevant license and insurance are not permitted to transport students at any time.

It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats / booster seats for younger children. 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 must declare any regular medication that may impact on their ability to transport pupils safely.

15. Photography, videos and other images or media

Illuminate AP Provisions seek consent from all parents and carers with parental responsibility regarding the use of images of pupils. These images may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of activities. Under no circumstances are staff allowed to use their personal equipment to take images of pupils at or on behalf of Illuminate AP.

Whilst images are regularly used for very positive purposes, adults need to be aware of the potential for these to be taken and misused or manipulated for inappropriate purposes. Particular regard needs to be given when images are taken of young or vulnerable children who may be unable to question why or how the activities are taking place. Pupils who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Staff should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation.

When Illuminate AP has been given consent to use images taken on site for publicity purposes, the child will never have their full name published and the location of the image will not be shared. Images will be stored securely and used only by those authorised to do so. Every Illuminate AP provision has a device for taking images which is stored securely on site and not removed from the setting for any unlawful purposes. Any images taken cannot be reproduced or shared outside of the provision. Illuminate AP do not take images of children who are looked after without permission from the child's social worker or the person with parental responsibility.

16. Exposure to Inappropriate Images

Staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images. There are no circumstances that will justify adults: making, downloading, possessing, or distributing indecent images or pseudo-images of children. Accessing these images, whether using the provisions or personal equipment, on or off the premises, or making, storing, or disseminating such material is illegal. If indecent images of children are discovered at the provision or on provision equipment an immediate referral should be made to the Local Area Designated Officer (LADO) and the police contacted. The images/equipment should be secured and there should be no attempt to view or delete the images as this could jeopardise necessary criminal action. If the identity of the child in the images is known a referral should also be made to Children's Social Care.

Under no circumstances should any adult use Illuminate AP equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adult to continue working with children and young people. Staff should keep their passwords confidential and not allow unauthorised access to equipment. In the event of any indecent images of children or unsuitable material being discovered on a device the equipment should not be tampered with in any way. It should be secured and isolated from the network, and the LADO contacted without delay. Staff should not attempt to investigate the matter or evaluate the material themselves as this may lead to a contamination of evidence and a possibility that they will be at risk of prosecution.

17. Personal Living Accommodation

Illuminate AP staff should not invite any pupils into their living accommodation, their private residence or their home. It is not appropriate for staff to be expected or requested to use their private living space for any activity. Under no circumstances should pupils be asked to assist adults with jobs or tasks, either for or without reward, at or in their private accommodation.

Under no circumstances is it acceptable for a staff member to share their home address with students, their parents or carers. Staff should do all they can to reasonably protect their private location from being known by students. In circumstances where this is not possible due to staff living in close proximity to students, staff should self-report on CPOMS Staff Safe with the details of how their home location came to be known and by which pupil. When staff are transporting pupils who live close to their home residence, they should never arrange to meet the child at their own personal residence.

18. Curriculum

Many areas of the curriculum can include or raise subject matter which is of a sexual, political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the outcomes identified by the session plan. Mentoring students can sometimes lead to discussions where mentors must ensure not to share their own personal opinion or thoughts that could influence a young person's behaviour in a damaging or negative manner. Responding to children's questions requires careful judgement and staff should take guidance in these circumstances from the Designated Safeguarding Lead. Care should be taken to comply with Illuminate AP's policy on spiritual, moral, social, cultural beliefs which promotes fundamental British values and is rigorously reviewed to ensure it is lawful and consistently applied.

Staff should also comply at all times with the session plans for Personal Social and Health Education (PSHE) promoting healthy relationships inclusive of an understanding of consent. It should be noted that parents and carers are required to provide consent for their child to have this education and staff should be aware of who has and does not have consent for this education within their provision.

Many of the young people who attend Illuminate AP have experienced adverse childhood experiences and it is important that any curriculum which may trigger an emotional response in a student is carefully planned, monitored and evaluated for effectiveness. Students are always given opportunities to opt out of education that is of a sensitive and personal nature. Staff must ensure that any incidents or conversations with young people that raise concern are recorded promptly on CPOMS. These concerns include but are not limited to, abuse, neglect, grooming, radicalisation, mental health and other vulnerabilities.

19. Duty to Report Concerns

There is a duty to report (including self-reporting) any incident in which an adult has or may have behaved in a way that is inconsistent with this staff code of conduct including inappropriate behaviours inside and outside of work or online. Staff should recognise their individual responsibility to raise any concerns regarding behaviour or conduct (including low level concerns) that falls short of the principles outlined in this document and the employee handbook. It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Failure to report or respond to such concerns would constitute a failure in professional responsibilities to safeguard children and promote welfare. All concerns must be reported on CPOMS Staff Safe.

Reviewed by: Rebecca Freeman

Date: 03/09/2025

Next Review by: 21/07/2026