

## Learning Centre CIC

### STAFF CODE OF CONDUCT POLICY

#### INTRODUCTION

Our Code of Conduct is designed to give clear guidance on the minimum standards of behaviour all Rainbow horses staff are expected to observe, and the CEO should provide this code to all staff on induction and should notify staff of the expectations therein.

This Code of Conduct should be read and understood in the context of:

- an agreed job description or contract;
- appropriate professional standards;
- policies and procedures; and
- statutory requirements and regulations that apply to schools/ alternative provisions - in particular safeguarding and promoting the welfare of children in schools.

#### KEY FACTS

- **Applies to all Rainbow Horses staff including Centre based employees, volunteers, work placements, trainees and members of companies or voluntary organisations.**
  - **Clear set of rules outlining the responsibilities and expected standards of behaviour.**
  - **Policy based on mutual dignity and respect which helps everyone to provide high quality, safe and nurturing environments for learners and young people.**
  - **Staff are in a position of trust and have a duty to protect learners from harm and to maintain professional boundaries.**
  - **Avoid behaviour that might be misinterpreted by others.**
  - **No member of staff must ever work behind a locked door with a student.**
- c) Rainbow Horses staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example and demonstrates moral integrity to all the pupils within the Centre. As a member of the community, each employee has an individual responsibility to maintain their reputation and the reputation of Rainbow Horses, whether inside or outside working hours.

- b) The purpose of the Code is to assist you in carrying out your job by making clear the standards of behaviour Rainbow Horses requires you to meet.
- c) Rainbow Horses values and respects all members of the community. Colleagues are expected to work in co-operation and collaboration, within an ethos of mutual trust and confidence. All employees and volunteers must be committed to promoting the safety, welfare and interests of pupils as paramount. Staff are expected to place the wellbeing, development and progress of learners at the heart of their professional practice.
- d) This policy refers to, and is consistent with, the following relevant Statutory and Non Statutory Guidance:
- Keeping Children Safe in Education (September 2023)
  - Working Together to Safeguard Children (2018)
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- e) References made to 'child/ pupils/learners' and 'children' refer to children and young people under the age of 18 years. However, the principles apply to professional behaviours towards all students, including those over the age of 18 years. 'Child/pupils/learners' should therefore be read to mean any student at Rainbow Horses.

## **STANDARDS**

- a) Rainbow Horses employees are expected to give the highest possible standard of service to the public and to support fellow employees with impartiality. The highest standard of probity must apply and employees must report any suspected unlawfulness, mal-administration, impropriety or breach of procedure of which they are aware to the CEO.

## **WORKING WITH PUPILS/SAFEGUARDING**

- a) Staff must not demean or undermine learners, their parents or carers, or colleagues.
- b) All staff who work at Rainbow Horses set examples of behaviour and conduct which can be copied by learners. Staff must therefore avoid using inappropriate or offensive language at all times.
- c) Staff must take reasonable care of learners under their supervision with the aim of ensuring their safety and welfare.
- d) Staff must comply with policies and procedures that support the well-being and development of learners. (See Appendix 1)
- e) Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of learners.

- f) Staff must follow reasonable instructions that support the development of learners.
- g) Staff are expected to work with all learners, irrespective of their demeanour or ability and should never attempt to refuse to do so. However, under certain circumstances, if specific issues arise with a particular learner, this may be discussed with the team manager and special arrangements put in place.
- h) Staff should use their judgement when alone with learners. They should leave a door open, be visible through glass doors and windows or ask for someone to sit in if concerned.
- i) Staff should not establish or seek to establish social contact with learners or parents for the purpose of securing a friendship or to pursue or strengthen a relationship. Where staff need to make any social contact with pupils this should be discussed with, and approved by, the CEO.
- j) As a general rule, staff should avoid contact with students outside Rainbow Horses. This includes not engaging with learners on social media in any way.
- k) They must not give learners their personal contact details (including but not limited to mobile phone numbers and personal email addresses). Thank you letters to learners or parents should not contain these personal details. If children locate these by any other means and attempt to contact or correspond, the adult should not respond and must report the matter to the DSL.
- l) They must not make arrangements to meet learners, individually or in groups, outside Rainbow Horses other than on centre visits authorised by the CEO.
- m) They should not contact or visit learners at home without prior agreement of the CEO. They should keep a record of any such occasion and ensure they are never alone with the learner if they visit the learner's home.
- n) They must not attend private learner parties and should be aware of their professional standing and responsibilities when attending external events at which learners are also present.
- o) It is hoped that staff will be reassured by this Code. Its purpose is to promote the highest standards of care for students and to protect staff and other adults from making professional misjudgements and from the potentially devastating consequences of false allegations, without compromising bona- fide centre activities.
- p) Further advice on safeguarding children is included in the Child Protection Policy.

## **TEAMWORK FOR STAFF**

- c) All staff are expected to work as part of the whole Rainbow Horses team and speak appropriately to other staff at all times, avoiding any abusive or offensive language.

- b) It is the responsibility of all employees to carry out reasonable instructions given by team leaders or senior staff. If an employee refuses to obey a reasonable instruction, it will be necessary to investigate the situation and may lead to disciplinary action being taken.
- c) Mutual respect between employees and trustees is essential for the smooth running of the centre. Employees and trustees should use the correct procedures to deal with any work-related issues.
- d) Staff should not establish or seek to establish social contact with parents for the purpose of securing a friendship or to pursue or strengthen a relationship. Where staff need to make any social contact with parents this should be discussed with, and approved by, the CEO

### **Isolation and one-to-one working**

- a) If an adult is alone with a learner he/she should ensure that any such meeting or lesson is as visible as possible and that it takes place in public or semi-public places. As such, he/she should ensure that the door to the room has a glass panel which is not obscured or is left open. If this is not possible then another adult must be close by. Furniture should also be positioned to allow easy access into or out of the room.
- b) Staff working in one to one situations with children and young people may be more vulnerable to allegations and students may be more vulnerable to harm by those seeking to abuse their trust. All staff should recognise this possibility and plan and conduct such meetings or lessons accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and students are met. The CEO should undertake a risk assessment in relation to the nature and implications of one-to-one working and individual risk assessments should be carried out in respect of adults for whom lone working is an integral part of their role. Any arrangements should be reviewed on a regular basis. It may be necessary to amend these to take account of particular student needs. This does not mean that working one-to-one is unacceptable; it just requires a proportionate risk assessment.
- c) No member of staff must ever be behind a locked door with a student. Staff should never arrange a one to one meeting in a remote or secluded area. Any meetings which take place outside agreed working arrangements should not take place without the agreement of the DSL and parents. Staff should always report any incidents or concerns to the CEO.

### **PERSONAL APPEARANCE AND DRESS CODE**

- a) Adults should dress and present with appearance appropriate to their professional role; this 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 could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation

## **SMOKING/ALCOHOL/DRUGS**

- a) Alcohol may not be consumed during working hours. Staff are not permitted to smoke anywhere on the premises or grounds or within view.
- b) Staff should be role models to children and young people, so any smoking should be done outside the premises and ***completely out of sight of children.***

## **USE OF CARS**

- a) Staff should never give lifts to pupils without clearing it with a member of the Senior Management. Two members of staff should accompany any child in a car. Please refer to the Transport Policy for further guidance on the clarification of car checks and insurance.

## **USE OF THE CENTRE'S FACILITIES AND EQUIPMENT**

- a) Rainbow Horses is entitled to expect at least the same standard of care of its property as employees give to their own property. Any facilities, property or equipment provided by the centre should only be used in connection with official duties except where the CEO have agreed to private use. Private phone calls or photocopying should only be undertaken after consulting with senior management. Private phone calls should only be undertaken in an emergency.
- b) When an employee ceases working for Rainbow Horses, all papers and other records, equipment and any other property of Rainbow Horses must be returned.

## **FRAUD AND CORRUPTION**

- a) Although Rainbow Horses believes employees and organisations associated with the centre will act with honesty and integrity, it recognises that occasionally this will not be the case. Rainbow Horses culture is one of honesty and zero tolerance in respect of fraud and corruption.

## **PERSONAL INTERESTS**

- a) Any personal interests, financial or otherwise, must be registered when they could reasonably be deemed to potentially conflict with any work undertaken by employees in the course of their duties. The CEO will be responsible for ensuring that all employees are aware of the need to register personal interests. Employees should register their interests if appropriate.
- b) A non-financial interest may occur when an employee or their partner, family member or close friend has membership or association in a company, society, club or other body, trade union or voluntary body, or is employed by another person or company which has direct financial interests in any matter which is the subject of discussions/negotiations with Rainbow Horses.

- c) Details of interests must be made in writing and sent to the CEO who will record it in a register and acknowledge receipt of the declaration (a copy should be retained in the centre).
- d) Employees with a financial or non-financial interest in any matter should not only declare that interest but also seek to distance themselves from involvement in that matter. Employees must be open and up front about their interest in all associated dealings. In particular, any such interest must be stated at meetings, whether trustee meetings or other meetings, public or private. Notes taken at the time should be placed in the appropriate file concerning the interest(s) and how it has been handled.
- e) Employees must not use their position and knowledge of Rainbow Horses to gain access to and provide information which puts a particular contractor or anyone else in a better position than any other contractor tendering to undertake work or to provide services or supplies.

## **REPORTING A CONCERN**

- a) “Whistleblowing” by employees of the centre is fully supported and encouraged. Where concerns arise these should be brought to the attention of the CEO at all times. If the employee feels they can’t tell their employer they should contact Nottingham City Council or the trustee contact, as detailed in the Whistleblowing Policy. This is for staff who wish to report serious concerns relating to any suspicions or allegations of fraud and corruption or any malpractice or maladministration.
- b) General guidance can be found at - <https://www.gov.uk/whistleblowing>
- c) The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **PERSONAL LETTERS, GIFTS AND ELECTRONIC COMMUNICATION**

- a) Staff should only write letters or send emails to individual students about routine matters of academic study or pastoral care, congratulations on recent achievements or other purely professional issues
- b) Adults should not give presents to an individual student (as opposed to small gifts to a whole group). If an adult believes it to be necessary to write a personal note or give a present to an individual student, s/he should discuss the purpose and context with a senior colleague, who should refer to the CEO if they require further advice.
- c) Adults need to be aware that the giving of gifts can be misinterpreted by others as a gesture either to bribe or groom a young person.

- d) All staff using e-mail should be aware of the less formal style that can characterise this form of communication and should ensure that e-mails do not convey an inappropriate or overly familiar tone. There are occasions when children, young people or parents wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thank you and this is acceptable although if the member of staff feels that this may indicate a crush or infatuation he/she should refer this matter to the CEO. However, it is unacceptable to receive gifts on a regular basis or of any significant value.
- c) A register will be maintained by the CEO detailing all offers of gifts or hospitality made to employees . The following information will be recorded, based on information reported by employees:-
- the person or body making the offer
  - the member of staff to whom the offer was made;
  - the gift or hospitality offered
  - the circumstances in which the offer was made
  - the action taken by the member of staff concerned
- b) Where a suspected breach has been reported a formal investigation will be undertaken and recorded.

## **USE OF IMAGES**

- a) There are no circumstances that will justify adults making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the centre's or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.
- b) If indecent images of children are discovered at the establishment or on the centre's equipment an immediate referral will be made by the CEO to the (Local Authority) Designated Officer and reported to the police.
- c) Under no circumstances should any adult use rainbow horse's equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This would raise serious concerns about the suitability of the adults to continue working with children and young people.

## **PHOTOGRAPHY, VIDEOS AND OTHER IMAGES**

- a) Staff should not be expected or allowed to use their own personal equipment to take images of students at or on behalf of Rainbow Horses. Rainbow Horses may provide memory cards for use on personal cameras. Staff may agree to use a personal device to take a photograph for an agreed upload to social media or for centre records (e.g. on an educational visit). In such cases the image must be immediately deleted following upload/transfer.
- b) Whilst images are regularly used for very positive purposes, adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming'

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

- c) Images must not be used in the public domain unless parental permission has been given.

## **CONFIDENTIALITY AND DATA PROTECTION**

- a) Staff must respect the privacy of students, parents and colleagues and must not pass confidential or sensitive information to any third parties (including addresses or telephone numbers), without checking first with the person concerned.
- b) In some circumstances staff may have access to confidential information relating to students. These details must be kept confidential at all times and only shared when legally permissible and in the interests of the child.
- c) Information about students, parents or colleagues must never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.
- d) The storing and processing of personal information about students and staff is governed by the data protection legislation. All employees and volunteers must adhere to the Data Protection Policy.
- e) If a staff member is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the DSL. Any actions should be in line with locally agreed information sharing protocols. Staff should never use confidential or personal information about a student or his/her family for their own, or others advantage. 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.
- f) There are circumstances in which a member of staff may be expected to share information about a student, 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. The centres Safeguarding and Child Protection Policy and Procedures must always be followed. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children

## **MAINTENANCE OF THE FIRE REGISTER / SAFEGUARDING RESPONSIBILITIES**

- a) All staff must sign in and out of the site via the IN/OUT signing in sheet or inform senior management of leaving site, each and every time they enter or leave; this is to enable an accurate fire register to be maintained at all times.
- b) The main gate should be kept closed at all times and never left ajar to maintain the security for staff, pupils, animals and resources.

## **USE OF PERSONAL DEVICES INCLUDING MOBILE PHONES**

- a) All staff accompanying pupils on Educational Visits, or any activity off site, are asked to have mobile phones on in order to maintain efficient communication to ensure the safety of all



- b) Staff may, after consulting the CEO, use mobile devices when undertaking work-related tasks off-site.
- c) Designated staff may need to have mobiles for staff communication such as staff absence. Therefore, team leaders may have access to mobile phones for management duties.
- d) In all the above, staff should use mobile phones discreetly and sensitively, so as not to distract from the work of the centre.
- e) It may be necessary for staff to use a mobile in the case of an urgent personal safety matter. If this is the case, then staff are to seek permission from their team leader or the CEO
- f) Please read the Mobile Phone Policy very carefully.

### **ACCEPTABLE USE OF ICT**

- a) The Acceptable Use Policy defines and describes the acceptable use of technology and mobile devices for all staff. Its purpose is to establish clear expectations about the safe use of technology for staff and students.

### **EQUALITY ISSUES**

All employees must comply with Rainbow Horses policies on Equal Opportunities.

### **HEALTH AND SAFETY ISSUES**

Employees should ensure they read and follow all Health and Safety policies and arrangements relating to their employment. (See Appendix 1)

### **CONDUCT OUTSIDE OF WORK**

While outside of work employees should not conduct themselves in a manner which may bring Rainbow Horses into disrepute. This includes use of personal social media which employees are advised to keep private where possible.

### **BREACHES OF THE CODE OF CONDUCT**

- a) Any suspected breach of this Code must be reported to the CEO or senior management.
- b) Where a suspected breach has been reported, a formal investigation into that suspected breach will be undertaken.

