GREENE'S COLLEGE OXFORD

Staff Code of Conduct

This policy was adopted in August 2026.

This policy is due to be reviewed in August 2027.

The person responsible for the implementation of this policy is the Designated Safeguarding Lead.

It is the responsibility of the College's Governing Body to ensure that this policy is reviewed and updated annually.

Contents

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Greene's Tutorial College, trading as Greene's College Oxford, is a company limited by guarantee, registered in England as number: 5553889

Overview
Conduct for safer working practices
1. Context
2. Unsuitability
3. Duty of care
4. Confidentiality
5. Making a professional judgement
6. Power and positions of trust
7. Propriety and behaviour
8. Dress and appearance
9. Personal living space
10. Gifts, rewards and favouritism
11. Infatuations
12. Communication with children and young people (including use of technology)
13. Social contact
14. Sexual contact
15. Physical contact
16. Other activities that require physical contact
17. Behaviour management
18. Use of physical intervention
19. Children and young people in distress
20. Personal care
21. First aid and administration of medication
22. One-to-one situations (including tuition)
23. Home visits
24. Transporting children and young people
25. Trips and outings
26. Photography and video
27. Access to inappropriate images and internet usage
28. Whistle blowing
29. Sharing concerns and recording incidents

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Overview

In their work, all Greene's staff have a duty of care to safeguard and promote the welfare of children and young people with whom they come into contact.

We expect that all staff when working with children act professionally and aim to provide a safe and supportive environment that secures the well-being and very best outcomes for the children and young people in their care. It is also recognised that in this area of their work tensions and misunderstandings can occur. It is here that the behaviour of staff may give rise to allegations of abuse being made against them. Allegations may be malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned. Equally, it must be recognised that some allegations will be genuine and – despite our best measures of prevention – there may be staff who will deliberately seek out, create or exploit opportunities to abuse children. It is therefore essential that all possible steps are taken to safeguard children and young people and ensure that the staff working with them are safe to do so.

This code of conduct aims to address concerns regarding the potential vulnerability of staff working at Greene's. It also aims to provide clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. The code of conduct provides practical guidance for all staff regardless of their role, responsibilities or status. It seeks to ensure that the duty to promote and safeguard the wellbeing of children is in part, achieved by raising awareness of illegal, unsafe and inappropriate behaviours.

It is recognised that the guidance in this code cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this document, or which directly contravene guidance given by Greene's. It is expected that in these circumstances staff will always advise the designated member of staff at Greene's of the justification for any such action already taken or proposed.

Staff have a duty to be familiar with the Greene's 'Safeguarding & child protection policy and staff procedures' and other documentation and procedures in place for safeguarding the welfare of children and young people. Staff have a duty to report any child protection or welfare concerns to the designated member of staff at Greene's and in line with our 'Safeguarding and child protection policy'. Staff should also know how to access the Oxfordshire Safeguarding Children Partnership policy and procedures for managing allegations against staff.

It is important that all staff at Greene's understand that the nature of their work and the responsibilities related to it place them in a position of trust.

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This code of conduct provides advice on appropriate and safe behaviours for all staff in a wide range of settings.

The code of conduct aims to:

- keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assist staff working with children to work safely and responsibly and to monitor their own standards and practice;
- set clear expectations of behaviour and/or codes of practice relevant to Greene's;
- provide a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- support safer recruitment practice;
- minimise the risk of misplaced or malicious allegations made against staff; and
- reduce the incidence of positions of trust being abused or misused.

Conduct for safer working practices

1. Context

All staff who work with children and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This code of conduct and guidance has been produced to help staff working in all settings to establish safe and responsive environments that safeguard young people and reduce the risk of staff being unjustly accused of improper or unprofessional conduct.	*This means that these guidelines:* *apply to **all** staff working in all settings whatever their position, role, or responsibilities; and may provide guidance where an individual's suitability to work with children and young people has been called into question.*
The guidance contained in this document is an attempt to identify what behaviours are expected of staff who work with children and young people. Staff whose practice deviates from this guidance and/or any other Greene's documents and procedures whether or not related to safeguarding and child protection may bring into question their suitability to work with children and young people.	*This means that staff should:* - *have a clear understanding about the nature and content of this document;* - *discuss any uncertainties or confusion with the Greene's Designated Safeguarding Lead or Deputy; and* - *understand what behaviours may call into question their suitability to continue to work with children and young people.*

2. Unsuitability

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3. Duty of Care

All staff are accountable for the way in which they exercise authority; manage risk; use resources; and safeguard children and young people.

Staff have a duty to keep children and young people safe and to protect them from sexual, physical and emotional harm. Children and young people have a right to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of children and young people. Failure to do so may be regarded as neglect.

The duty of care is in part, exercised through the development of respectful and caring relationships between staff and children and young people. It is also exercised through the behaviour of the adult, which at all times should demonstrate integrity, maturity and good judgment.

Everyone expects high standards of behaviour from adults who work with children and young people.

When individuals accept such work, they need to understand and acknowledge the responsibilities and trust inherent in that role.

This means that staff should:

- *understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached;*
- *always act, and be seen to act, in the child's best interests avoid any conduct which would lead any reasonable person to question their motivation and intentions; and*
- *take responsibility for their own actions and behaviour.*

This means that Greene's should:

- *ensure that appropriate safeguarding and child protection polices and procedures are adopted, implemented and monitored;*
- *ensure that codes of conduct and practices are continually monitored and reviewed;*
- *ensure that, where services or activities are provided by another body, the body concerned has appropriate safeguarding polices and procedures;*
- *ensure that systems are in place for concerns to be raised;*
- *ensure that staff are not placed in situations which render them particularly*

Greene's also has a duty of care towards staff under the Health and Safety at Work Act 1974. This requires Greene's to provide a safe working environment for adults and provide guidance about safe working practices. Greene's also has a duty of care for the well-being of staff and to ensure that staff are treated fairly and reasonably in all circumstances. The Human Rights Act 1998 sets out important principles regarding protection of individuals from abuse by state organisations or people working for those institutions**.** Staff who are subject to an allegation should therefore be supported and the principles of natural justice applied.

The Health and Safety Act 1974 also imposes a duty on staff to take care of themselves and anyone else who may be affected by their actions or failings.
Greene's duty of care and the adult's duty of care towards children should not conflict. This 'duty' can be demonstrated through the use and implementation of this code of conduct.

- *ensure that codes of conduct and practices are continually monitored and reviewed;*
- *ensure that, where services or activities are provided by another body, the body concerned has appropriate safeguarding polices and procedures;*
- *foster a culture of openness and support;*
- *ensure that systems are in place for concerns to be raised;*
- *ensure that staff are not placed in situations which render them particularly vulnerable;*
- *ensure all staff have access to and understand this guidance and related, policies and procedures;*
- *ensure that all job descriptions and person specifications clearly identify safeguarding policies & requirements*

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Confidentiality

4. Making a professional judgement

This guidance cannot provide a complete checklist of what is or is not inappropriate behaviour for staff in all circumstances. There may be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child or 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 children in their charge. Such judgements, in these circumstances, should always be recorded and shared with the Greene's Designated Safeguarding Lead or Deputy. In undertaking these actions individuals will be seen to be acting reasonably.

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

Staff may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to or be given highly sensitive or private information. These details must be kept confidential at all times and only shared when it is in interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass the child or young person concerned.

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 or the Designated Safeguarding Lead.

The storing and processing of personal information about children and young people is governed by the Data Protection Act 2018. Staff should follow the advice in the Greene's data protection policy to understand their responsibilities under this legislation.

Whilst staff need to be aware of the need to listen to and support children and young people, they must also understand the importance of not promising to keep secrets. Neither should they request this of a child young person under any circumstances.

Concerns and allegations about staff should be treated as confidential and passed to the designated safeguarding lead or deputy without delay.

This means that where no specific guidance exists staff should:

This means that staff:

- *be clear about what information can be shared and in what circumstances and to whom it is appropriate to do so;*
- *are expected to use professional judgement about when to share information and keep it confidential;*
- *should seek advice from a senior member of staff or the Designated Safeguarding Lead or Deputy;*
- *always discuss any information they hold or which has been requested of them, and should record any decisions and reasons why actions were taken; and*
- *record any areas of disagreement about course of action taken and if necessary refer to a higher authority.*

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5. Power and positions of trust

As a result of their knowledge, position and/or the authority invested in their role, all staff working with children and young people are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

A relationship between a member of staff and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Staff 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 and avoid behaviour which might be misinterpreted by others. They should report and record any incident with this potential.

Where a person aged 18 or over is in a specified 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.

This means that staff should not:

- *use their position to gain access to information for their own or others' advantage;*
- *use their position to intimidate, bully, humiliate, threaten, coerce or undermine children or young people; and*
- *use their status and standing to form or promote relationships which are of a sexual which may become so.*

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Property and behaviour

All staff working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work. There may be times, for example, when a member of staff's behaviour or actions in their personal life come under scrutiny and is considered to compromise their position in their workplace or indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. Staff in contact with children and young people should therefore understand and be aware that safe practice also involves using judgement and integrity about behaviours.	*This means that staff should not:* - *behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model; and* - *make, or encourage others to make, unprofessional personal comments which scapegoat, demean or humiliate, or which might be interpreted as such.* *This means that staff should:* - *be aware that behaviour in their personal lives may impact upon their work with children and young people;* - *follow any codes of conduct deemed appropriate by their organisation; and* - *understand that the behaviour and actions of their partner (or other family members) may raise questions about their suitability*

6. Dress and appearance

College expectations are that appearance should be professional at all times both when in College and also when acting as a representative of the College at external venues. Staff must use common sense in adhering to the principles underpinning acceptable clothing.

When working with students or other staff, the standard of appearance should be smart-casual as a minimum. Clothing which: (i) displays inappropriate slogans or images (ii) reveals underwear or inappropriate bare flesh (iii) resembles beach-wear, including flip flops is likely to be judged inappropriate. There may be obvious exceptions however, for example sportswear and protective clothing are appropriate to the role. Again, staff professional discretion is key.

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7. Gifts, rewards, and favouritism

The giving of gifts or rewards to children or young people should be part of an agreed practice for supporting positive behaviour or recognising particular achievements. In some situations, the giving of gifts as rewards may be accepted practice for a group of children, whilst in other situations the giving of a gift to an individual child or young person will be part of an agreed plan, recorded and discussed with senior manager and the parent and/or guardian. It is acknowledged that there are specific occasions when staff may wish to give a child or young person a personal gift. This is only acceptable practice where the member of staff has first discussed the giving of the gift and the reason for it, with a senior manager and parent and/or guardian and the action is recorded. Any gifts should be given openly and not be based on favoritism. Staff 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. Staff should exercise care when selecting children and/or young people for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny. Care should also be taken to ensure that adults do not accept any gift that might be construed as a bribe by others. There are occasions when children, young people or parents wish to pass small tokens of appreciation to staff e.g. on special occasions or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.	*This means that staff should:* - *be aware that the giving and receiving of gifts must be part of acceptable practice, be transparent and discussed with a senior manager;* - *ensure that gifts received or given in situations which may be misconstrued are declared and recorded;* - *generally, only give gifts to an individual young person as part of an agreed reward system;* - *ensure that, where giving gifts other than as above, these are of insignificant value; and* - *ensure that all selection processes which concern giving gifts and rewards to children and young people are fair and that wherever practicable these are undertaken and agreed by more than one member of staff.*

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8. Infatuations

It is not uncommon for some students to become strongly attracted to a member of staff or to develop an infatuation. If any member of staff becomes aware of an infatuation, they should discuss it with the Designated Safeguarding Lead (DSL) immediately so that they can receive support on the most appropriate way to manage the situation. Staff are in a position of power and trust in relation to students, which means that the interaction between a staff member and a student (or other young person) cannot be that of equals. Staff must therefore treat students with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position.

All staff should clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the staff who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

This means that staff should not:

- *have sexual relationships with children and young people;*
- *have any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact;*
- *make sexual remarks to, or about, a child/young person;*
- *discuss their own sexual relationships with or in the presence of children or young people*

9. Communication with Children and Young People (*including the Use of Technology*)

Communications with students must always be professional in nature. Staff should not write personal messages to students on social networking websites. They should not accept students as friends on social media whilst the student is enrolled at Greene's. Staff should also not give their personal mobile phone numbers or personal e-mail addresses to students, unless there is a demonstrable and valid professional reason for doing so. In our duty to safeguard students, we will do all that is reasonable to ensure our students and staff stay e-safe and to satisfy our wider duty of care. The Online Safety Policy applies to all use of the internet and electronic communication devices such as e-mail, mobile phones and social networking sites, including images & text. This document sets out the College's policy with regards to online safety, but also provides guidance in dealing with any breaches.

Any sexual activity between a member of staff and the child or young person with whom they work may be regarded as a criminal offence and will always be a matter for disciplinary action.

Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not. The sexual activity referred to within this guidance is contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

Working Together to Safeguard Children definitions and guidance contains a good practice to avoid one to-one meetings with students in secluded areas, and wherever possible, ensure that others are within earshot, use a room with a visual panel and / or leave the door open (unless there are good reasons why the conversation has to be had in confidence);

10. Social Contact

We all have a responsibility to ensure that our behaviour is always appropriate. It is good practice to

It is important to report to a member of the safeguarding team any one-to one situation in which a student may show signs of becoming uncomfortable with the session. Prearranged meetings with students away from the College premises are not permitted unless approval has sought from their parent and the DSL or other senior colleague with delegated authority.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place.

11. Sexual Contact

12. Physical Contact

Staff may occasionally be required to have physical contact with children as part of their role. These are occasions when it is entirely appropriate for staff to have some physical contact with the child or young person with whom they are working. However, it is crucial that in all circumstances, staff should only touch children in ways which are appropriate to their professional or agreed role and responsibilities.

Not all children and young people feel comfortable about physical contact, and staff should not make the assumption that it is acceptable practice to use touch as a means of communication. Permission should be sought from a child or young person before physical contact is made. Where the child is very young, there should be a discussion with the parent or carer about what physical contact is acceptable and/or necessary.

When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, sex, gender, ethnicity and background. 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, nevertheless, should use their professional judgement at all times, observe and take note of the child'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 child for the minimum time necessary.

This means that staff should:

- *be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described;*
- *never touch a child in a way which may be considered indecent;*
- *always be prepared to report and explain actions and accept that all physical contact be open to scrutiny;*
- *not indulge in 'horseplay';*
- *always encourage children, where possible, to undertake self-care tasks independently;*
- *work within Health and Safety regulations;*
- *be aware of cultural or religious views about touching and always be sensitive to issues of gender; and*
- *understand that physical contact*

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Physical contact which occurs regularly with an individual child or young person is likely to raise questions unless there is explicit agreement on the need for, and nature of, that contact. This would be within the parameters of established, agreed and legal professional protocols on physical contact e.g. sport activities or medical procedures. Any such arrangements should be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny. 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 their action could be misinterpreted, or if an action is observed by another member of staff as being inappropriate or possibly abusive, the incident and circumstances should be reported to the Greene's DSL or Deputy, the procedures for handling allegations followed and an appropriate record made. Where a child seeks or initiates inappropriate physical contact with a member of staff, the situation should be handled sensitively and care taken to ensure that contact is not exploited in any way. Careful consideration must be given to the needs of the child and advice and support given to the member of staff concerned. It is recognised that some children who have experienced abuse may seek inappropriate physical contact. Staff should be particularly aware of this when it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to some actions being misinterpreted. In all circumstances where a child or young person initiates inappropriate physical contact, it is the responsibility of the staff member to sensitively deter the child and help them understand the importance of personal boundaries. Such circumstances must always be reported and discussed with the Greene's DSL or deputy.	*This means that Greene's should:* - *ensure they have a system in place for recording incidents and the means by which information about incidents and outcomes can be easily accessed by senior management* - *make staff aware of relevant professional or organisational guidance in respect of physical contact with children and meeting medical needs of children and young people where appropriate* - *be explicit about what physical contact is appropriate for staff working in their setting.*

13. Other activities that require physical contact

14. Behaviour management

Staff who work in certain settings, for example sports drama or outdoor activities will have to initiate some physical contact with children, for example to demonstrate technique in the use of a particular piece of equipment, adjust posture, or perhaps to support a child so they can perform an activity safely or prevent injury. Such activities should be carried out in accordance with existing codes of conduct, regulations and best practice. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment i.e. one easily observed by others and last for the minimum time necessary. The extent of the contact should be undertaken with the permission of the child/young person. Contact should be relevant to their age or understanding and staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child. Guidance and protocols around safe and appropriate physical contact are provided by national organisations, for example sports governing bodies or major arts organisations and should be understood and applied consistently. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the Greene's DSL or Deputy. It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities.	*This means that staff should:* - *treat children with dignity and respect and avoid contact with intimate parts of the body;* - *always explain to a child the reason why contact is necessary and what form that contact will take;* - *seek consent of parents where a child or young person is unable to do so because of a disability;* - *consider alternatives, where it is anticipated that a child might misinterpret any such contact;* - *be familiar with and follow recommended guidance and protocols;* - *conduct activities where they can be seen by others; and* - *be aware of gender, cultural or religious issues that may need to be considered prior to initiating physical contact.* *This means that Greene's should:* - *have up to date guidance and protocols on appropriate physical contact in place that promote safe practice and include clear expectations of behaviour and conduct.* - *ensure that staff are made aware of this guidance and that safe practice is continually promoted through supervision and training.*

All staff are expected to treat other colleagues, students and external contacts, such as parents, with dignity and respect. It is therefore expected that members of staff will adopt high standards of personal conduct in order to maintain the respect of all those with whom they work. Unacceptable behaviour such as discrimination, bullying, harassment or intimidation will not be tolerated. This includes physical and verbal abuse and use of inappropriate language or unprofessional behaviour with colleagues, students and parents. Where students display difficult or challenging behaviour, staff must follow the College's Disciplinary policy.

There are circumstances in which staff working with children displaying extreme behaviours can legitimately intervene by using either non-restrictive or restrictive physical interventions. This is a complex area and relevant government guidance and legislation should be followed.

The use of physical intervention should, wherever possible, be avoided. It should only be used to manage a child or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned

The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual to be controlled and the nature of the harm they may cause. The minimum necessary force should be used and the techniques deployed in line with recommended policy and practice.

This means that staff should:
- always seek to defuse situations
- always use minimum force for the shortest period necessary
- record and report, as soon as possible after the event, any incident where physical intervention has been used.

This means that Greene's should:
- ensure that an effective recording system is in place which allows for incidents to be tracked and monitored

Under no circumstances should physical force or intervention be used as a form of punishment.

The duty of care which applies to all staff requires that reasonable measures are taken to prevent children being harmed. The use of unwarranted physical force is likely to constitute a criminal offence.

In settings where restrictive physical interventions may need to be employed regularly, i.e. where staff are working with children with extreme behaviours associated with learning disability or autistic spectrum disorders, Greene's will provide specific guidance on the use of such intervention. Individual care plans, drawn up in consultation with parents and/or guardians and where appropriate, the child, should set out the strategies and techniques to be used and those which should be avoided. Risk assessments should be carried out where it is foreseeable that restrictive physical intervention may be required.

In all cases where physical intervention is employed the incident and subsequent actions should be documented and reported.

This means that staff should:
- *always seek to defuse situations*
- *always use minimum force for the shortest period necessary*
- *record and report, as soon as possible after the event, any incident where physical intervention has been used.*

This means that Greene's should:
- *ensure that an effective recording system is pace which allows for incidents to be tracked and monitored*
- *ensure adults are familiar with the above*
- *ensure that staff are appropriately trained.*

15. Use of control and physical intervention

16. Children and young people in distress

There are some settings, where staff are involved in managing significant or regular occurrences of distress and emotional upset in children, for example with regard to recurring Child health and other health problems. In these circumstances professional guidance should be followed and staff should be aware of what is and what is not acceptable behaviour when comforting a child or diffusing a situation. This is particularly important when working on a one-to-one basis.

For all other staff working with children there will be occasions when a distressed child needs comfort and reassurance and this may involve physical contact.

Staff should use their professional judgement to comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

Where a member of staff has a particular concern about the need to provide this type of care and reassurance, or is concerned that an action may be misinterpreted, this should be reported and discussed with a senior manager and parents and/or guardians.

This means that staff should:

- *consider the way in which they offer comfort and reassurance to a distressed child and do it in an age- appropriate way;*
- *be circumspect in offering reassurance in one to one situations, but always record such actions in these circumstances;*
- *follow professional guidance or code of practice where available;*
- *never touch a child in a way which may be considered indecent;*
- *record and report situations which may give rise to concern from either party; and*
- *not assume that all children seek physical comfort if they are distressed.*

It is expected that staff working with children and young people should be aware of basic first aid techniques. It is not however, a contractual requirement and whilst staff may volunteer to undertake such tasks, they should be suitably trained and qualified before administering first aid and/or any agreed medication.

When administering first aid, wherever possible, staff should ensure that another member of staff is aware of the action being taken. Parents should always be informed when first aid has been administered.

In circumstances where children need medication regularly a health care plan should have been established to ensure the safety and protection of children and the staff who are working with them. Depending upon the age and understanding of the child, they should where appropriate, be encouraged to self-administer medication or treatment including for example any ointment, use of inhalers.

Staff need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the children and young people with whom they work.

17. Personal care

Young people are entitled to respect and privacy at all times and especially when in a state of undress, changing clothes, bathing or undertaking any form of personal care. There are occasions where there will be a need for an appropriate level of supervision in order to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

This means that Greene's should:

- *ensure staff understand the extent and limitations of their role in applying basic care and hygiene tasks for minor abrasions and understand where an injury requires more experienced intervention;*
- *ensure there are trained and named individuals to undertake first aid responsibilities;*
- *ensure training is regularly monitored and updated; and*
- *always ensure that arrangements are in place to obtain parental consent for the administration of first aid or medication.*

This means that staff should:

- *adhere to the Greene's policy for administering first aid or medication;*
- *comply with the necessary reporting requirements;*
- *make other staff aware of the task being undertaken;*

This means that staff should not:

- *change in the same place as children;*
- *shower or bathe with children; and*
- *assist with any personal care task which a child or young person could undertake by themselves.*

This means that staff should:

- *avoid any physical contact when children are in a state of undress;*
- *avoid any visually intrusive behaviour; and*
- *where there are changing rooms announce their intention of entering.*

18. First aid and administration of medication

19. One-to-one situations (including tuition)

One-to-one tuition is an integral part of the Greene's method of learning. All staff directly and indirectly involved in one-to-one tuition should prioritise the welfare of children and young people as an integral part of all one-to-one tuition arrangements.

Where one-to-one tuition and other one-to-one situations take place certain procedures and explicit safeguards must be in place. All staff participating in one-to-one situations because of the nature of their work owe a duty of care to the child or young person and must maintain professional boundaries.

One-to-one situations – including tuition – have the potential to make a child/young person more vulnerable to harm by those who seek to exploit their position of trust. Staff working in such one-to-one settings with children and young people may also be more vulnerable to unjust or unfounded allegations being made against them. Both possibilities should be recognised and staff must use their professional judgement so that reasonable and sensible precautions are taken with regard to one-to-one situations. Every attempt should be made to ensure the safety and security of children and young people and the staff who work with them.

Meetings with children and young people outside agreed working arrangements should not take place without the agreement of senior managers at Greene's and parents and/or guardians.

This means that staff should:

- *always act and be seen to act in the child's best interests;*
- *report and record any administration of first aid or medication;*
- *have regard to any health plan which is in place, and always ensure that an appropriate health/risk assessment is undertaken prior to undertaking certain activities;*
- *ensure that when one-to-one tuition is an integral part of their role, full and appropriate risk assessments have been conducted and agreed;*
- *avoid meetings with a child or young person in remote, secluded areas or unapproved locations;*
- *always inform other colleagues and/or parents and/or guardians about the contact(s) beforehand, assessing the need to have them present or close by;*
- *avoid use of practices – such as not being in telephone contact – that may create an opportunity for secrecy or the interpretation of secrecy;*
- *always report any situation where a child becomes distressed or angry to a senior colleague; and*
- *carefully consider the needs and circumstances of the child/children when in one-to-one situations.*

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20. Home visits

Staff may be requested to make home visits – such as to provide tuition. A risk assessment should include an evaluation of any known factors regarding the child/young person, parents and others living in the household. Risk factors such as hostility, child protection concerns, complaints or grievances can make adults more vulnerable to an allegation. Following an assessment, appropriate risk management measures should be in place before visits are agreed. Under no circumstances should a member of staff visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the member of staff must have a prior discussion with a senior manager and the parents or carers and a clear justification for such arrangement is agreed and recorded.	*These means that staff should:* - *agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. providing tuition* - *always make detailed records including times of arrival and departure and work undertaken* - *ensure any behaviour or situation which gives rise to concern is discussed with senior management and, where appropriate, action is taken.*

There will be occasions when staff are expected or asked to transport children as part of their duties. Staff, who are expected to use their own vehicles for transporting children should ensure that the vehicle is roadworthy, appropriately insured and that the maximum capacity is not exceeded.

It is a legal requirement that all passengers should wear seat belts and it is the responsibility of the staff member to ensure that this requirement is met.

Where staff transport children in a vehicle which requires a specialist license/insurance e.g. PCV or LGV - staff should ensure that they have an appropriate licence and insurance to drive such a vehicle.

It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

This means that Greene's should:

- *ensure that they have home visit and lone working policies of which staff are made aware.*
- *ensure that all visits are justified and recorded*
- *ensure that staff are not exposed to unacceptable risk*
- *ensure that staff have access to a mobile telephone and are aware of emergency procedures*

This means that staff should:

- *ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement and/or ability to drive safely*
- *be aware that the safety and welfare of the child is their responsibility until they are safely passed over to a parent/carer*
- *record details of the journey in accordance with agreed procedures*
- *ensure that their behaviour is appropriate at all times*
- *ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety. This includes having proper and appropriate insurance for the type of vehicle being driven*
- *ensure that any impromptu or emergency arrangements of lifts are recorded and can be justified if questioned.*

21. Transporting children and young people

22. Trips and outings

Staff should take particular care when working with children and young people on trips and outings where the setting is less formal than usual. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well being of children and young people.

Informed written consent from parents or carers and agreement, where possible, from the child or young person, should always be sought before an image is taken for any purpose.

Careful consideration should be given as to how activities involving the taking of images are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media, or on the internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

Adults need to remain sensitive to any children who appear uncomfortable, for whatever reason, and should recognise the potential for such activities to raise concerns or lead to misunderstandings.

It is not appropriate for adults to take photographs of children for their personal use.

This means that staff should:

- *always have another adult present in out of activity times unless otherwise agreed with a senior manager*
- *undertake risk assessments in line with Greene's policies*
- *have parental consent to the activity*
- *ensure that their behaviour remains professional at all times*
- *never share beds with a child/children or young people.*
- *not share bedrooms unless it involves a dormitory situation and the arrangements have been previously discussed with a senior manager.*
- *always ensure they have parental permission to take and/or display*

23. Photography and videos

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	This means that staff should not: - *display or distribute images of children unless they have consent to do so from parents and guardians* - *use images which may cause distress* - *take images 'in secret', or taking images in situations that may be construed as being secretive.*

24. Access to and usage of inappropriate images and the internet

There are no circumstances that will justify adults possessing indecent images of children. Adults who access and possess links to such websites will be viewed as a significant and potential threat to children. Accessing, making and storing indecent images of children on the internet is illegal. This will lead to criminal investigation and the individual being barred from working with children and young people, if proven. Adults should not use equipment belonging Greene's to access adult pornography; neither should personal equipment containing these images or links to them be brought into the workplace. This will raise serious concerns about the suitability of the adult to continue to work with children. Adults should ensure that children and young people are not exposed to any inappropriate images or web links. Organisations and adults need to ensure that internet equipment used by children have the appropriate controls with regards to access. e.g. personal passwords should be kept confidential. Where indecent images of children or other unsuitable material are found, the police and Local Authority Designated Officer (LADO) should be immediately informed. Adults should not attempt to investigate the matter or evaluate the material themselves, as this may lead to evidence being contaminated which in itself can lead to a criminal prosecution.	*This means that Greene's should* - *have clear e-safety policies in place about access to and use of the internet* - *make guidance available to both staff and children and young people about appropriate usage.* *This means that adults should:* - *follow their organisation's guidance on the use of IT equipment* - *ensure that children are not exposed to unsuitable material on the internet* - *ensure that any films or material shown to children and young people are age appropriate.*

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25. Whistle blowing

Whistle blowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Greene's has a clear whistle blowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistleblowing procedures should be made aware that their employment rights are protected.

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 children may be at risk.

This means that Greene's should:

- *ensure it has appropriate whistle- blowing policies in place*
- *ensure that it has clear procedures for dealing with allegations against staff which are in line with their Local Safeguarding Children Partnership's procedures.*

This means that staff should:

- *report any behaviour by colleagues that raises concern regardless of source.*

Individuals should be aware of Greene's child protection procedures, including procedures for dealing with allegations against staff. All allegations must be taken seriously and properly investigated in accordance with local procedures and statutory guidance.

In the event of any allegation being made to someone other than a manager, information should be clearly and promptly recorded and reported to a senior manager without delay.

This means that staff should be familiar with Greene's system for recording concerns

- *should take responsibility for recording any incident, discussion on that information where they have concerns about any matter relating to the welfare of a child or where they have concerns about any matter relating to the welfare of an individual in the workplace*

26. Sharing concerns and recording incidents

Staff should always feel able to discuss with their line manager any difficulties or problems that may affect their relationship with children and young people so that appropriate support can be provided or action can be taken. It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.	*This means that Greene's:* - *should have an effective, transparent and accessible system for recording and managing concerns raised by any individual in the workplace.*

27. Low Level Concerns

Staff should be aware that a low-level concern is one that does not meet the harm threshold as stated in the College's Safeguarding Policy. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e. they believe it could be a concern) – that an adult working in or on behalf of the College may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work;
- Does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Using inappropriate sexualised, intimidating or offensive language. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which ultimately intended to enable abuse.

It is very important that low level concerns are shared, to embed a culture of openness, and transparency in which the expected behaviour set out in this Staff Code of Conduct is lived and reinforced by all staff. This should also protect staff from potential false allegations or misunderstandings.

Staff must record all low-level concerns in writing (this may be done over e-mail). The DSL will securely retain confidential files on low-level concerns.

The record should include:

- Details of the concern;
- The context in which the concern arose;
- Action taken.

The name of the individual sharing their concerns should also be noted, though if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

The DSL should ultimately be informed of all low-level concerns and make the final decision on how to respond.

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