# 2026 Staff Behaviour "Code of Conduct" Policy

This document is based upon the Safer Recruitment Consortium document 'Guidance for safer working practice for those working with children and young people in education settings' (2022)

## FURTHER INFORMATION, ADVICE AND SUPPORT

For further information, please contact the Head of Delivery or CEO.

Lifespace subscribe to the A&A Safeguarding in Education Advice and Support Subscription Service – contact advice@aasine.co.uk where applicable for additional guidance.

## TABLE OF CONTENTS


| | | |
|---|---|---|
| 1. | Overview | Pg. 3 |
| 1.1 | Introduction | 3 |
| 1.2 | Definitions | 3 |
| 1.3 | Purpose of the Code of Conduct | 4 |
| 1.4 | Compliance with the Code of Conduct | 5 |
| 1.5 | Background | 5 |
| 1.6 | What to do if you are worried a child is being abused | 5 |
| 1.7 | Underpinning Principles | 5 |
| 2 | Safe Working Practice and professional conduct | 6 |
| 3 | Context | 6 |
| 4 | 'Unsuitability' | 6 |
| 5 | Responsibilities | 6 |
| 6 | Making professional judgements | 6 |
| 7 | Power and positions of trust and authority | 7 |
| 8 | Confidentiality | 7 |
| 9 | Standards of behaviour | 7 |
| 10 | Dress and appearance | 8 |
| 11 | Gifts, rewards, favouritism and exclusion | 8 |
| 12 | Infatuations and 'crushes' | 9 |
| 13 | Social contact outside of the workplace | 9 |
| 14 | Communication with children and and their parents/carers (including the use of technology) | 9 |
| 14.1 | Self-referrals 16+ | 10 |
| 15 | Use of technology for online/virtual delivery | 10 |
| 16 | Use of social media, personal websites and blogs while on official duty and outside work | 11 |
| 17 | Responses to children's behaviour that adults find challenging | 11 |
| 18 | The use of control and physical intervention | 12 |
| 19 | Sexual conduct | 12 |
| 20 | One-to-one situations (face to face and online/virtual) | 12 |
| 21 | Transporting children and young people | 13 |
| 22 | Visits, trips and outings | 13 |
| 23 | First aid | 13 |
| 24 | Photography, videos, other imaged and use of smart devices | 13 |
| 25 | Exposure to inappropriate images | 14 |
| 26 | Whistleblowing and duty to report concerns about any breaches of Staff Behaviour Policy | 14 |
| 27 | Sharing and recording all allegations and low-level concerns | 15 |
| 28 | Responding to allegations that meet the harm threshold and to low-level concerns | 15 |
| 29 | Professional behaviour | 16 |
| 30 | Criminal actions | 16 |
| 31 | Declaration of interests | 16 |
| 32 | Probity of records and other documents | 16 |
| 33 | Financial inducements | 16 |
| 33.1 | Business contacts | 17 |
| 33.2 | Declaration of gifts | 17 |
| 33.3 | Gifts or hospitality | 17 |
| 34 | Other employment | 17 |
| 35 | Health and safety | 17 |
| 36 | Use of alcohol or illegal drugs | 17 |
| 37 | Use of Lifespace premises, equipment & communication systems | 18 |
| 38 | Related Lifespace Policies | 18 |
| 39 | Reference Sources | 18 |
| Appendix 1 | Declaration of Interests Form | 20 |
| Appendix 2 | Register of Gifts and Hospitality | 21 |

# 1 OVERVIEW

This is Lifespace's Staff Behaviour Policy, otherwise known as our "Code of Conduct." The document applies to all Lifespace staff, including trustees, volunteers, freelancers and consultants. They apply to all of the charity's activities. It is a core component of the charity's strategy to fulfil its statutory responsibilities to safeguard and promote the welfare of all children and young people. The Staff Behaviour Policy (Code of Conduct) is referred to throughout the document as 'the policy'. This policy is available on our website.

All staff are required to read it and confirm they have done so in writing before commencing work. They must attend annual Safeguarding Training and re-read and confirm they have read, annually. In summary, to meet and maintain our responsibilities towards children, our expectations include:

- treating all children with respect;
- setting a good example by conducting themselves appropriately;
- involving children in decisions that affect them;
- encouraging positive, respectful and safe behaviour among children;
- being a good listener;
- being alert to changes in children's behaviour and to signs of abuse, neglect and exploitation;
- recognising that challenging behaviour and mental health difficulties may be an indicator of abuse;
- reading and understanding the child protection policy, code of conduct policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety and information-sharing;
- asking the child's permission before initiating legitimate physical contact, such as administering first aid;
- being mindful that in most circumstances physical contact with a young person is inappropriate, (except a handshake), but that young children may initiate gestures such as a hug. This is best avoided (e.g. kindly using distraction of hugging a toy instead) and should be reported to school and Lifespace DSL to protect the mentor
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language;
- not participating in, tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- understanding behaviours (potentially criminal in nature) which constitute sexual harassment, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts;
- being aware that the personal and family circumstances and lifestyles of some children and lead to an increased risk of abuse;
- referring all concerns about a child's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care;
- following our rules regarding communication and relationships with children, including via social media; and
- referring all allegations against members of staff or other adults that work with children and any concerns about staff conduct which breaches the code of conduct policy directly to the CEO; and any similar allegations against or concerns about the CEO directly to the chair of trustees.
- to embody the Lifespace Charter, which sets out how we will behave.

## 1.1 INTRODUCTION

All employees and volunteers have personal and legal responsibilities that are wider than their safeguarding responsibilities, including treating others with dignity and respect; acting honestly; using public funds appropriately; adhering to health and safety guidelines; and practising equal opportunities at all times. These expectations are also set out in the policy and should be fully observed by all staff and volunteers including trustees.

## 1.2 DEFINITIONS

References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles of this policy apply to professional behaviours towards all pupils, including those over the age of 18 years. 'Child' should therefore be read to mean **any child or young person**.

The term 'allegation' means where it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

References made to adults and staff refer to all those who work for Lifespace in either a paid or unpaid capacity. Those criteria are defined in *Keeping Children Safe in Education (DfE 2026)* as the 'harm threshold'.

As required by *Keeping Children Safe in Education* 2026 (Part four), the Local Authority Designated Officer (LADO) will be informed within one working day of all allegations that meet the harm threshold. However, the word 'allegation' may be more widely interpreted to include any concern about a breach of or failure to comply with this policy, referred to in *Keeping Children Safe in Education 2026* as a 'low-level concern'.

*Keeping Children Safe in Education 2026* highlights that the term 'low-level concern' does not mean that it is insignificant. *KCSiE* defines a low-level concern as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school/setting may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; but does not meet the definition of an allegation as above or is otherwise not serious enough to consider a referral to the LADO. *KCSiE* goes on to say that such low-level concerns may arise in several ways and from a number of sources, e.g. suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

### 1.3 PURPOSE OF THE STAFF BEHAVIOUR POLICY (CODE OF CONDUCT)

This policy is based on an update by the Safer Recruitment Consortium of a document previously published for schools by DfES. It seeks to ensure that the responsibilities of senior leaders towards children and staff are discharged by:

- raising awareness of illegal, unsafe, unprofessional and unwise behaviour;
- clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assisting staff to monitor their own standards and practice; and reduce the risk of allegations being made against them.

It is also recognised that not all people who work with children work as paid or contracted employees. It is important that all adults working with children understand that the nature of their work, and the responsibilities related to that work, place them in a position of trust. The principles and guidance outlined in this policy apply and should be followed by any person whose work brings them into contact with children.

The policy is intended to provide a clear message that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action may follow. The charity may refer to the policy in any disciplinary proceedings.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that any guidance cannot cover all eventualities. There may be times when professional judgements are made in situations not covered by this policy; or which directly contravene the policy. It is expected that in these circumstances staff will always advise the designated safeguarding lead and/or CEO of the justification for any such action already taken or proposed.

All adults who work with children have a responsibility to be aware of systems which support safeguarding and these should be explained to them as part of their induction and in regular staff training sessions. That includes this policy and Lifespace's *Child Protection and Safeguarding Policy*.

Creating a culture in which all concerns about adults (including allegations as defined above and all low-level concerns about breaches of this policy) are shared responsibly and with the correct person, recorded and dealt with appropriately, is critical. If implemented correctly, this policy should encourage an open and transparent culture; enable the charity to identify concerning, problematic or inappropriate behaviour early; and minimise the risk of abuse. A culture of vigilance will help to ensure that adults working in or on behalf of Lifespace are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the charity.

**The charity's expectations of staff in relation to reporting all such allegations and behaviours including low-level concerns are set out in sections 26-28 of this policy**.

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. However, it is also recognised that achieving those aims is not always straightforward, as tensions and misunderstandings can occur. This policy aims to reduce the risk of misunderstandings

It must be recognised that some allegations will be genuine as there are people who seek out, create or exploit opportunities to harm children. Some concerns about staff conduct may be deemed 'low-level concerns' about an adult who does not intend to harm a child but:

- their behaviour does not support a culture of safeguarding; and/or
- their behaviour may be an early indicator they are struggling to cope with their work for some reason and are therefore at risk of behaving unsafely in some way; and/or
- they may need support in order to establish or maintain appropriate professional boundaries and/or to continue working safely with children; and/or
- their behaviour may unwittingly mask the harmful behaviour or intentions of others by undermining adherence to this policy and/or the school/setting's culture of safeguarding.

Allegations may also be false or misplaced and may arise from differing perceptions of the same event. Whatever is the case, when allegations occur, they are inevitably distressing and difficult for all concerned. It is therefore essential that all possible steps are taken to safeguard children and ensure that the adults working with them do so safely. In the event that any member of staff is affected by anything they have witnessed and/or reported or is facing any form of allegation, support can be made available via the CEO, or Chair of trustees.

### 1.4 COMPLIANCE WITH THE STAFF BEHAVIOUR POLICY (CODE OF CONDUCT)

This policy forms part of an employee's contract of employment. Failure to comply with it and with the associated policies as highlighted in 'Required Reading' may result in disciplinary action being taken where breaches of the policy warrant such action. The policy should be provided for all staff (either electronically or by providing a paper copy) to read before they commence work. Before having any contact with children, all staff should be given an opportunity to discuss the policy with a member of the leadership team and ask any questions in order to clarify understanding.

All staff are expected to treat children, other colleagues, parents and external contacts with dignity and respect and to comply with all relevant policies. 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.

### 1.5 BACKGROUND

All adults who come into contact with children in their work - whether paid or unpaid - have a duty of care[1] to safeguard and promote their welfare.

The Children Act 2004 places a duty on organisations to safeguard and promote the well-being of children and young people. This includes the need to ensure that all adults who work with or on behalf of children and young people in these organisations are competent, confident and safe to do so.

*Working Together to Safeguard Children*[2] (DfE2026) and *Keeping Children Safe in Education*[3] (DfE 2026) define safeguarding as 'protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes'.

This policy has due regard to current legislation and statutory guidance.

### 1.6 WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED

Staff must be familiar with the *Child Protection and Safeguarding Policy, Behaviour Policy* and *Whistleblowing Policy*. If a member of staff has a concern about a child, they should raise that concern with the charity's designated safeguarding lead as set out in the *Child Protection and Safeguarding Policy*.

However, **concerns about abuse of children and/or the conduct of staff must be referred to the CEO.** Concerns about the conduct of the CEO should be referred to the Chair of Trustees. Such referrals can also be made directly to the LADO. Please refer to section 27 'Sharing and recording all allegations and low-level concerns'.

**If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care Services via Family Connect *on 01926 414144;* or – in circumstances of immediate risk to the child – to the Police directly. Anybody can make a referral. If the child's situation does not appear to be improving the staff member/volunteer with concerns should press for re-consideration.**

### 1.7 UNDERPINNING PRINCIPLES

- The welfare of the child is paramount. [4]
- Staff should understand their responsibilities to safeguard and promote the welfare of children/young people. 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 if their conduct or behaviour falls short of these guiding principles.
- Staff should acknowledge that deliberately invented/malicious allegations by children are extremely rare and that all concerns should be reported and recorded.
- Staff should discuss and/or take advice promptly from their supervisor 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 and the leadership team should continually monitor and review practice to ensure guidance is followed.

- 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) from working in regulated activity.
- Staff and the leadership team should continually monitor and review practice to ensure guidance is followed.
- Staff should be aware of and understand the charity's *Child Protection and Safeguarding Policy*, arrangements for managing allegations against staff, this *Staff Behaviour "Code of Conduct" Policy*, *Whistleblowing Policy* and the local multi-agency safeguarding procedures established by the local multi-agency partnership.

## 2 SAFE WORKING PRACTICE AND APPROPRIATE PROFESSIONAL CONDUCT

Each section of the policy hereafter provides general guidance about a particular aspect of work. Whilst every attempt has been made to cover a wide range of situations, it should be recognised that any guidance cannot cover all eventualities. The COVID-19 pandemic is one example of a circumstance which had not been foreseen and where multiple agencies had to review and amend guidance rapidly and repeatedly.

In any such unusual/unprecedented/unexpected circumstances, professional judgements may need to be made in situations not covered by existing guidance, or which directly contravene guidance previously issued. In such circumstances, staff are expected always to advise their headteacher/principal, designated safeguarding lead, officer in charge or line manager of the justification for any such action already taken or proposed.

## 3 CONTEXT

All staff have a responsibility to be aware of systems within their school/setting which support safeguarding and any temporary amendment to these should be explained to them by senior managers. This includes the charity's *Child Protection and Safeguarding Policy*, this Staff Behaviour Policy (or Code of Conduct) and other applicable policies as outlined in section 39.

## 4 'UNSUITABILITY'

The guidance contained in this policy is an attempt to identify what behaviours are expected of staff who work with children and young people. Adults whose practice deviates from this policy may bring into question their suitability to work with children and young people. The guidance may be used as reference by managers and the LADO when responding to allegations made against or concerns about the behaviour of staff.

## 5 RESPONSIBILITIES

All staff have a responsibility to keep children and young people safe and to protect them from sexual, physical and emotional abuse, neglect and extra-familial harm including sexual and criminal exploitation and radicalisation. Children and young people 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 the safety and well-being of children and young people. Failure to do so may be regarded as professional misconduct.

The safeguarding culture of Lifespace is, in part, exercised through the development of respectful, caring and professional relationships between adults and children. It is also exercised through the behaviour of adults, which at all times should demonstrate integrity, maturity and good judgement. When individuals accept a role working with young people, they should understand and acknowledge the responsibilities and trust involved in that role.

Employers also have a duty of care towards their employees, both paid and unpaid, under Health and Safety legislation which requires them to provide a safe working environment for staff.

Legislation also imposes a duty on employees[5] to take care of themselves and anyone else who may be affected by their actions or failings. Health and Safety duties and the adults' responsibilities towards children should not conflict. Safe practice can be demonstrated through the use and implementation of this policy.

## 6 MAKING PROFESSIONAL JUDGEMENTS

This policy cannot provide a complete checklist of what is or is not appropriate behaviour for staff and volunteers in all circumstances. It does highlight, however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff or volunteers have to make decisions or take action in the best interests of a child which could contravene this guidance or where no guidance exists. Individual members of staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. Such judgements, in those circumstances, should always be recorded and shared with the CEO and DSL.

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

## 7 POWER AND POSITIONS OF TRUST AND AUTHORITY

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children in a school/setting are in positions of trust in relation to those children.

The relationship between an adult working with a child/ren is one in which the adult has a position of power or influence. It is vital for all such adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence.

The potential for exploitation and harm of vulnerable children and young people 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 and avoid behaviour which could be misinterpreted by others. They should report and record any such incident to the CEO or DSL. This is as relevant in the online world as it is in the classroom. Staff engaging with young people online have a responsibility to model safe practice at all times. Please also see sections 11-13.

Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence[6] 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.

## 8 CONFIDENTIALITY

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children in a school are in positions of trust in relation to those children.

The storing and processing of personal information is governed by the General Data Protection Regulations UK (GDPR) and Data Protection Act 2018. Employers should provide clear advice about their responsibilities under this legislation so that, when considering sharing confidential information, those principles are applied.

Staff may have access to special category personal data about children, young people and their families which must be kept confidential at all times and only shared when legally permissible to do so and in the interests of the child or young person. Records should only be shared with those who have a legitimate professional need to see them.

Staff should never use confidential or personal information about a child 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 child's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee or volunteer may be expected to share information about a child, 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/carer – makes a disclosure regarding abuse or neglect, the member of staff must always take any such concerns seriously and follow the charity's procedures. 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 a child or parent/carer that they will keep secrets that relate in any way to the safety or well-being of any individual 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 to keep it confidential, he or she should seek guidance from the designated safeguarding lead. Any media or legal enquiries should be passed to the CEO.

Additionally, concerns and allegations about members of staff, or other adults working on behalf of Lifespace should be treated as confidential and passed to the CEO (or the chair of trustees or LADO if the concerns are about the CEO) without delay.

Everyone has the right to request access to data that is held about them. Such requests should be made to the CEO.

## 9 STANDARDS OF BEHAVIOUR

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. They should adopt high standards of personal conduct in order to maintain the confidence and respect of the general public and all those with whom they work.

This includes the way in which staff speak to children. A positive, respectful and encouraging tone should be used at all times. Where it is necessary to get attention in the interests of keeping everybody safe and maintaining a safe environment, it is reasonable for staff to raise their voices and/or use an authoritative tone.

Staff should refer to children by name. Disrespectful nicknames, words and terms should be avoided. Staff should exercise caution in referring to young people by affectionate nicknames and more general terms of endearment or familiarity such as 'Dear, Love, Petal, Mate, Dude'.

Staff should be aware that use of such terms might cause some children to feel confused and/or uncomfortable, could be construed as being part of a grooming[7] process and as such will give rise to concerns about their behaviour. If staff choose to speak to young people using informal language, they should ensure it is not reserved for particular individuals in order to avoid any allegations of favouritism or concern about grooming behaviour. Staff should be particularly careful not use words specifically associated with grooming such as 'Sweetheart, Princess, Angel, Darling'.

Staff should understand and comply with the expectations of them in relation to their use of and behaviour when using telephones (both landline and mobile).

Staff using personal devices must ensure that their details are withheld by dialling 141 before entering the number.

There may be times when a member of staff's behaviour or 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 (face to face and online), either in or out of the workplace, could compromise their position in in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Misuse of drugs and/or alcohol, acts of violence, other criminal acts and inappropriate online behaviours such as threatening/extremist/misogynist/misandristic/homophobic/ disrespectful/discriminatory comments or posts; and anything indicating unsafe attitudes to children or adults or which undermines the charity's safeguarding culture would be examples of such behaviour.

The behaviour of an employee's partner or other family members may raise similar concerns and require careful consideration by the CEO as to whether there may be a potential risk to children and young people.

*Keeping Children Safe in Education* 2026 states that settings should make clear their expectation that staff should disclose any relationship or association (in the real world or online) that may impact on the setting's ability to safeguard pupils. This applies to all Lifespace staff.

Staff are expected to inform the CEO about any such matter which might have implications for the safeguarding of children so that the charity can safeguard the welfare of the member of staff as well as young people.

## 10 DRESS AND APPEARANCE

A person's dress and appearance are matters of personal choice and self-expression and some individuals will wish to exercise their own cultural customs.

Staff should ensure they are dressed decently, safely and appropriately for the tasks and work they undertake. That also applies to online or virtual delivery and when working offsite. Those who dress or appear in a manner which could be viewed as offensive, inappropriate or provocative will render themselves vulnerable to criticism or allegation.

We recognise that it is impossible to prescribe a specific dress code for mentors or youth workers. We believe that there is an element of informality our mentors provide which helps young people feel safe, not intimidated, and be able to build positive bridges with safe positive adults. Our mentors and youth workers are not teachers, and that perception is an important difference.

We also recognise that our team of mentors is very diverse in age, gender, background, personality and fashion sense. We believe this diversity is a wonderful thing. We certainly don't want to create a Lifespace uniform! Some helpful guidance on dress code for mentors in schools/College therefore includes:

- Notice the standard of dress in the place you visit and aim to match the standard (not necessarily the style). E.g., Some schools are more formal than others and we encourage mentors to respect the 'smart' ethos of the school within which we serve.
- We encourage skirts to be towards knee length or longer, and we suggest you use your discretion about the overall outfit.
- You need to feel comfortable at the same time as confident you are upholding the standards of the place within which you are working.

## 11 GIFTS, REWARDS, FAVOURITISM AND EXCLUSION

The giving of gifts or rewards to individual children and young people is not permitted. However, staff need to be aware that the giving of gifts to children their families could be interpreted by others as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return. In some situations, the giving of gifts as rewards may be accepted practice for a group, with prior agreement from the senior team and recorded.

There are occasions when children, young people or parents may wish to pass small tokens of appreciation to staff e.g. to mark a special achievement, occasion or religious festival or as a thank you and this is usually acceptable. Staff are required to send a photograph of gifts and/or notes to their supervisor for confirmation that they are within reasonable and/or low value parameter, and to safeguard staff from potentially inappropriate messaging. Supervisors, if unsure should consult the Head of Delivery or CEO.

However, **it is unacceptable for staff to receive money or gift cards,** on a regular basis or that are of any significant value. Financial gifts must be returned or handed to Lifespace where they will be considered to be a charitable donation. (N.B. See 33.2-33.3 for declaration of gifts.)

## 12 INFATUATIONS AND 'CRUSHES'

All staff need to recognise that it is not uncommon for a child or young person to be strongly attracted to an adult who works with them and/or develop a 'crush' or infatuation. They 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 child or young person has become or may be becoming infatuated with either themselves or a colleague, should immediately report this to the CEO[8]. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

The CEO (or chair of trustees) should give careful thought to those circumstances where the staff member, child or young person and their parents/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.

## 13 SOCIAL CONTACT OUTSIDE OF THE WORKPLACE

Members of staff should not establish or seek to establish social contact with children or their families for the purposes of securing a friendship or to pursue or strengthen a relationship.

However, it is acknowledged that staff may have genuine friendships and social contact with parents/ carers of young people, independent of the professional relationship, such as when a parent and staff are part of the same family/personal network or social/recreational circle. Those circumstances will usually be easily recognised, openly acknowledged and should be explicitly declared in writing by staff to the CEO. Members of staff should always take care to maintain appropriate personal and professional boundaries in any such circumstances.

Furthermore, staff should also be aware that professionals who sexually harm children often seek to establish relationships and contact outside of the workplace with both the child and their parents, in order to groom the adult and the child and/or create opportunities for sexual abuse.

It is also important to recognise that social contact may provide opportunities for other types of grooming such as for the purposes of sexual exploitation or radicalisation.

Staff should recognise that some types of social contact with young people or their families could be perceived as harmful or exerting inappropriate influence on children and may bring the charity into disrepute (e.g. attending a political protest, circulating propaganda). **Staff should therefore be aware that social contact in certain situations could be misconstrued as grooming.**

If a young person or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in that moment in making a response but should always discuss the situation with the CEO as soon as possible; and, if advised to do so by the CEO, with the parents/carers of the child or young person. **This applies to social contacts made through outside interests or the staff member's family.**

It is not appropriate for Lifespace staff to have contact with parents except in the case of direct referrals or self-referrals. In these cases communication will be around session booking and/or payment but will not include any personal details unless there is a safeguarding concern.

## 14 COMMUNICATION WITH CHILDREN AND THEIR PARENTS/CARERS (INCLUDING THE USE OF TECHNOLOGY)

In order to make best use of the many educational and social benefits of new and emerging technologies, children need opportunities to use and explore the digital world. Online safety risks are posed more by behaviours and values than the technology itself.

Staff should ensure that they establish safe and responsible online behaviours, working to local and national guidelines and acceptable use 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, such as mentoring virtually or remotely, should take place within clear and explicit professional boundaries. This includes the use of computers, tablets, phones, texts, Emails, instant messages, social media such as Facebook and Twitter, chat rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web cams and other handheld devices. (NB Given the ever-changing world of technology this list gives examples only and is not exhaustive.)

Staff who communicate with children and their parents using Email, telephone, text or social networking should only do so for professional purposes and by use of Lifespace accounts and ICT equipment.

Staff should not request or respond to any personal information from children or their parents 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 seek contact with or respond to requests for contact from children or their parents via personal telephone, text, Email, social media accounts or via online gaming and should not therefore give their personal contact details, e.g. Email address, home or mobile telephone numbers, details of web-based identities to children or their parents. If young people or their parents locate these by any other means and attempt to contact or correspond with a staff member, the latter should not respond and must report the matter to their line manager or CEO. The child/parent should be firmly and politely informed that this is not acceptable.

Staff should, in any communication with children, follow the guidance in section 9 'Standards of Behaviour' AND adhere to the charity's policies, including those with regard to communication with parents and carers and the information they share when using the internet.

Email, text, social networking or online gaming communications between a member of staff and a child/parent outside this policy and agreed protocols may lead to disciplinary and/or criminal investigations.

Charity email and social networking accounts should only be used in accordance with acceptable use.

Please also refer to section 13.

### 14.1 SELF REFERRALS 16+

- Where young people, 16+ self-refer, they must supply contact information for a parent, carer of legal guardian.
- The parent, carer or legal guardian will be contacted in the event of a safeguarding concern.
- In exceptional circumstances e.g. where there is suspected parental abuse, we will go directly to statutory services with any concerns.
- Only in the scenario that a young person does not have a school or college account may private emails may be used for appointment booking but NO personal information may be shared and NO online sessions will be permitted unless via a school/college email account.

## 15 USE OF TECHNOLOGY FOR ONLINE/VIRTUAL DELIVERY

This section provides further guidelines for staff and charity leaders in relation to online and virtual delivery; and online/virtual communication for mentoring and/or welfare purposes.

The charity will constantly review its policies and amend those if necessary, ensuring that all staff involved in online/virtual delivery or the use of technology to contact young people or parents for welfare or other approved professional purposes are briefed on best practice and any permanent or temporary changes to policy/procedures.

Mentoring sessions are private but, as per the Remote Mentoring Guidance will be recorded to safeguard mentor and mentee. Notes will be taken by the mentor and the time and duration of the appointment will be recorded and the Operations Coordinator informed.

When selecting a platform for online/virtual delivery, the charity will satisfy itself that the provider has an appropriate level of security, and consent from parents/carers for mentoring via the chosen platform. Staff will always use Lifespace owned devices and shared mailbox accounts for the delivery of online/virtual sessions and will contact young people, where delivering with a school partner, only via the pupil's school email address/log in. This ensures that the school's filtering and monitoring software is enabled.

In the case of the Youth Advisory Panel, the approach as for 16+ mentoring (see 14.1) will be adopted.

In deciding whether to provide virtual delivery, senior leaders should take into account issues such as accessibility within the family home, the mental health and wellbeing of children including, the potential for inappropriate behaviour, staff access to the technology required, etc. Virtual sessions should be timetabled and the CEO and DSL should be able to drop into any session at any time – the online version of entering a classroom for safeguarding purposes.

Where possible, applications that facilitate the recording of sessions will be used, subject to data protection and retention/storage guidelines; although it must be emphasised that recording virtual/online sessions and conversations per se does not prevent abuse. Charity leaders will randomly sample recorded sessions in order to safeguard children and staff and to ensure that policies are being followed.

Staff delivering online/virtually or communicating with children via video chat will be expected to display the same standards of dress and conduct that they would when working face to face, modelling appropriate behaviour and presentation to young people and parents.

Below are other issues that staff need to take into account when delivering online/virtually or communicating with children online, particularly where webcams are used:

- Staff and children must be appropriately dressed, as should anyone in the household.
- Any computers used should be in living/communal areas and not in bedrooms; and the background used by staff should be nondescript or blurred. If it is not possible to blur the background, staff must consider what children can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc.
- Staff must ensure that resources and videos used are age appropriate – in the event that a child feels distressed or anxious about content, they may not have support readily available.
- Live sessions should be recorded so that if any issues were to arise, the video can be reviewed.
- Language must be professional and appropriate, including that used by family members in the background.
- Staff must only use platforms specified by senior managers and approved by the partner school's ICT manager/co-ordinator for communication with pupils/students.
- Staff should make a written record of the length, time, date and attendance of any sessions held.
- Filters at a child's home may be set at a threshold which is different to that in use at a school/setting.

It is the responsibility of staff to act as a moderator, raising any issues of suitability (of dress, setting, behaviour) with the child and/or parent/carer immediately and ending the interaction if necessary. The staff member should make a written record of the incident and share it with the DSL or their line manager depending on the nature of the incident.

If a staff member believes that a child or parent is recording the interaction, the lesson should be brought to an end or the child should be logged out immediately.

In **rare and exceptional circumstances** where staff urgently need to contact a young person or parent/carer by telephone and do not have access to a charity-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the child/parent/carer is not able to identify the staff member's personal contact details.

## 16 USE OF SOCIAL MEDIA, PERSONAL WEBSITES AND BLOGS BY STAFF WHILE ON OFFICIAL DUTY AND OUTSIDE WORK

Staff may use social media, personal websites and blogs in a number of ways and for different purposes:

- For work related purposes using charity equipment and accounts either on charity premises or offsite. Access to some journals, blogs and social networking sites is permitted for these purposes;
- For personal (i.e. not work related) purposes using personally owned devices outside work time.

The charity must ensure that confidentiality and its reputation are protected. Lifespace respects members of staff's rights to a private life. However, staff who wish to set up personal web forums, websites or 'blogs' must do so outside of work and not use charity equipment for the purpose.

Any breach of these expectations may lead to disciplinary action.

## 17 RESPONSES TO CHILDREN'S BEHAVIOUR THAT ADULTS FIND CHALLENGING

All children and young people have a right to be treated with respect and dignity even in those circumstances where they display behaviour which staff experience as difficult or challenging. Corporal punishment/smacking are unlawful.

Staff should not use any form of degrading treatment to punish. The use of sarcasm, demeaning or insensitive comments towards children and young people; and any approach to behaviour management that seeks to persuade children to conform as a result of feeling shame and/or humiliation is completely unacceptable.

Staff should understand the importance of challenging inappropriate behaviours between children and young people, including child on child sexual violence and sexual harassment. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up", "boys being boys" or "girls

being girls" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report.

Where a child has specific needs in respect of behaviour that staff find particularly challenging, an assessment of risk, should be drawn up and agreed by all parties including, when appropriate, a medical officer.

## 18 THE USE OF CONTROL AND PHYSICAL INTERVENTION

Lifespace staff are not trained to use non-restrictive or restrictive physical interventions. Under no circumstances should physical intervention be used.

If delivering with a school premise, school staff may use physical intervention in line with their policies. If a member of staff feels threatened, or that other children or young people are threatened, they should seek support from school staff or, if providing community delivery, contact police on 112.

If an incident does occur, staff are required to record the incident and subsequent actions and report those to the CEO and DSL. who will ensure that, where applicable, the child's parents/carers are informed on the same day. Recording must include written and signed accounts of all those involved, including the young person.

## 19 SEXUAL CONDUCT

Any sexual behaviour by a member of staff with or towards a child is unacceptable.

Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with children by adults in a position of trust. It is an offence for a member of staff in a position of trust to engage in sexual activity with a child under 18 years of age[9] and sexual activity with a child could be a matter for criminal and/or disciplinary procedures.

Any sexual activity between a member of staff with a child irrespective of the latter's age will always be regarded as a grave breach of trust and a matter for disciplinary action.

Sexual activity involves physical 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*' states that sexual abuse "Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening".

**A member of staff allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.** All members of staff should therefore clearly understand the need to maintain appropriate boundaries in their contacts with children and young people.

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 that relationship so sexual abuse can take place. Staff should undertake appropriate training so they are aware of behaviours that may constitute grooming and of their responsibility always to report to the CEO any concerns about the behaviour of a colleague which could indicate that a child is being groomed.

Staff should also therefore be aware that conferring inappropriate special attention and favour upon a child might be construed as being part of a grooming process and as such will give rise to concerns about their behaviour.

## 20 ONE-TO-ONE SITUATIONS (FACE TO FACE AND ONLINE/VIRTUAL)

Staff - including visiting staff from external organisations - working in one-to-one situations with children within a school setting can be more vulnerable to allegations or complaints. Alongside that, it should also be recognised that one-to-one situations have the potential to make a child/young person more vulnerable to harm by any adult seeking to exploit their position of trust.

Both possibilities should be recognised so that in work like ours, reasonable and sensible precautions are taken. These might include, for example, staff mentoring on a one-to-one basis in visible areas; but facilitate other adults passing by periodically; and ensuring that, wherever possible, all rooms and areas in which one-to-one work might take place have observation windows. Every attempt should be made to ensure the safety and security of children and the staff who work with them.

Staff should maintain an awareness of any areas of the setting, times or situations which may place themselves or children in vulnerable situations; and should report any vulnerability identified to the DSL and CEO.

Arranging to meet with children away from the usual premises should not be permitted unless the necessity for this is clear and approval is obtained from the CEO or other senior colleague with delegated authority, the child and their parents/carers.

Where staff are expected to work one to one with a child on a virtual platform, staff are required to work in accordance with sections 14-15 of this policy.

## 21 TRANSPORTING CHILDREN

Lifespace do NOT permit staff to transport children unless under the express permission of the CEO.

## 22 VISITS, TRIPS AND OUTINGS

The duties in the Health and Safety at Work etc. Act 1974 and the supporting regulations apply to activities taking place on or off charity premises in Great Britain. All employers must have a Health and Safety policy. This should include policy and procedures for off-site visits, including residential visits and any adventure activities.

The Management of Health and Safety at Work Regulations (1999) impose a duty on employers to produce suitable and sufficient risk assessments. This would include assessment of any risks to employees, children or others, and the measures that should be taken to minimise these risks. For annual or infrequent activities, a review of an existing assessment may be all that is needed. For new higher-risk activities or trips, a specific assessment of the significant risks should be carried out.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in activities outside the usual workplace.

Staff should take particular care when supervising children in the less formal atmosphere of a trip where a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour stays within clearly defined professional boundaries, complies with this policy and could not be interpreted as seeking to establish an inappropriate relationship or friendship.

Where out of setting activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Children, staff and parents should be informed of these prior to the start of the trip. Those organising trips must pay attention to ensuring safe staff/child ratios and a suitable gender mix of staff.

Before all overnight stays, there should be a robust written briefing, which must include sleeping arrangements for children and staff; supervision arrangements when children are getting dressed and undressed and are asleep; the management of any unanticipated situations in which a member of staff finds themselves working one-to-one with a young person; and reporting arrangements including any safeguarding and whistleblowing issues.

## 23 FIRST AID

All settings should have an adequate number of qualified first aiders.

Where delivering within a school setting, school first aiders will be utilised.

Any member of staff may be asked to become a qualified first-aider or to provide support to young people with medical conditions but they cannot be required to do so unless this forms part of their contract of employment.

**For community based delivery**, staff should receive sufficient and suitable training and achieve the necessary level of competence before they take on responsibility to support children with medical conditions.

When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. After discussion with parents, children who are competent should be encouraged to take responsibility for managing their own medicines and procedures. This could include for example, the application of any ointment or sun cream, use of inhalers or auto-adrenaline injectors.

Lifespace does **NOT** permit staff to administer medication.

## 24 PHOTOGRAPHY, VIDEOGRAPHY AND IMAGES

The use of photography/videography is NOT permitted within mentoring provision but may, from time to time, be used within wider charity purposes.

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.[10]

To protect children we will:

- seek their consent for photographs or video images to be taken;
- seek parental consent;
- ensure children are appropriately dressed; and
- encourage children to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g., on our website or social media), we will:

- Obtain a signed photo/video release form
- avoid naming children when possible;
- if it is necessary to name children, use first names rather than surnames;
- if children are named, avoid using their image;
- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

For the protection of children and staff, only charity owned equipment will be used to record and store images taken by staff. Please seek guidance from a Core Team colleague before obtaining any images.

## 25 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 (child abuse images). Accessing these images, whether using the charity's equipment or personally owned equipment, on or off the premises, or making, storing or disseminating such material is illegal.

If indecent images of children are discovered on the charity's premises or equipment, an immediate referral will be made to the LADO and the Police will be contacted. The images/equipment will be secured and there should be no

attempt to view or delete the images as this could jeopardise necessary criminal action. If the images are of children known to Lifespace, a referral will also be made to children's social care in line with local multi-agency procedures[11]. Under no circumstances should members of staff use equipment belonging to the charity to access any form of pornography. Personal equipment containing pornography or links should never be brought into or used in Lifespace provision. This will raise serious concerns about suitability to continue working with children and young people.

Staff and volunteers should keep their passwords confidential, should educate children to do the same and should 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.

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 they will be at risk of prosecution themselves.

## 26 WHISTLEBLOWING AND DUTY TO REPORT CONCERNS ABOUT ANY BREACHES OF STAFF BEHAVIOUR POLICY

Whistleblowing is the mechanism by which staff can voice their concerns in good faith without fear of repercussion. The charity has a clear and accessible whistleblowing policy that meets the terms of the Public Interest Disclosure Act 1998. Staff who use whistleblowing procedures should have their employment rights protected.

In relation to whistleblowing concerning an allegation of abuse by a member of staff or any breach of this policy of a safeguarding nature, staff must comply with section 27 below.

Staff should recognise their individual responsibilities to bring matters of concern (including low-level concerns) about any breaches of this policy to the attention of the CEO and/or relevant external agencies including the LADO when appropriate; and that to not do so would constitute a failure in fulfilling professional responsibilities to safeguard children and promote their welfare.

*Keeping Children Safe in Education 2026 states that "*All staff and volunteers should feel able to raise concerns about any poor or unsafe practice and any potential failure in the school/setting's safeguarding regime and have confidence that any such concerns will be taken seriously."[12]

The NSPCC 'what you can do to report abuse' helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their organisation. Staff can call 0800 028 0285, 8AM to 8PM, Mon to Fri or email: help@nspcc.org.uk.

In the event of any adult working on behalf of charity needing to contact the Chair of Trustees, LADO or MASH Education Lead, contact details for all key personnel and also the NSPCC 'what you can do to report abuse' helpline number are provided with the *Child Protection and Safeguarding Policy*.

## 27 SHARING AND RECORDING ALL ALLEGATIONS AND LOW-LEVEL CONCERNS

In order to safeguard and protect children and colleagues by maintaining the charity as a safe environment for children, all staff including agency/external staff are expected to report any breach of this staff behaviour policy by colleagues, volunteers or agency/external staff - including what may seem minor contraventions or 'low-level concerns' - **to the CEO** without delay, in line with the charity's child protection procedures.[13]

That duty is not restricted to but includes specific allegations being made or incidents being witnessed, by any person, of abuse perpetrated by any member of staff, volunteer or other adult who works with children and young people at or on behalf of Lifespace.

Staff should inform the CEO about any allegation, low-level concern or breach of this policy **at the earliest possible opportunity** and by the end of the working day on which the concern arose **at the latest**. However, in the event that a concern is not reported by the end of the working day, staff are expected to act in accordance with the principle that it is never too late to report a concern in order to keep children safe.

The CEO is responsible for ensuring that there is a written record of **all** allegations and low-level concerns reported to them; creating that record themselves when necessary in relation to any concerns reported verbally. All such written records must include the time and date when the report is made.

In the event of the CEO being absent or unavailable for some reason (including times of closure or partial closure), or if the CEO is the concern, staff should contact the chair of trustees and/or take advice from the LADO or MASH Education Lead. Similarly, in the event that a member of staff feels the CEO or chair of governors has not taken their legitimate concerns seriously, they should escalate their concerns by contacting the chair of governors and/or take advice from the LADO or MASH Education Lead.

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

Members of staff and volunteers should always feel able to discuss with their line manager and/or CEO any difficulties or problems that may affect their relationship with or behaviour towards children, so that appropriate support can be provided and/or action can be taken.

## 28 RESPONDING TO ALLEGATIONS THAT MEET THE HARM THRESHOLD AND TO LOW-LEVEL CONCERNS

All reports of breaches of this policy including low-level concerns and specific allegations of abuse by staff, volunteers or agency/external professionals will be taken seriously and properly investigated in accordance with charity, local multi-agency child protection procedures and statutory guidance.

The CEO will consider all such reports to determine whether they meet the harm threshold or should be treated as a low-level concern. Where it is clear that an allegation meets the harm threshold, the CEO will inform the LADO within one working day and act in accordance with advice from the LADO thereafter. In the event of any uncertainty about whether a concern meets the harm threshold, the CEO will always consult and take advice from the LADO.

In some circumstances, the LADO will advise that the matter can be managed by the charity internally as a low-level concern. That may require informal management advice being given to the member of staff and/or may necessitate an internal investigation, possibly subject to the disciplinary policy. In all such circumstances and when responding to low-level concerns without the need to consult the LADO, the CEO will take advice from the charity's HR advisor and legal advisor as necessary.

When responding to a low-level concern, the CEO will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO, Police or HR advisor
- Where necessary, make arrangements for further investigation to be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the reported behaviour:
  - i) took place – if not, no further action will be required;
  - ii) took place but does not constitute a breach of this policy, in which case no further action may be required or further advice from HR will be sought;

iii) constitutes a breach of this policy but does not require formal disciplinary action – in which case, no further action, informal management advice and/or additional training/guidance/ support may be required to address the behaviour. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy;
iv) is serious enough to warrant discussion (or further discussion) with the LADO;
v) when considered in the context of other low-level concerns previously reported about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral will then be made to the LADO and advice taken from HR.

The CEO will ensure that detailed records are made of all conversations with the individual about whom concern has been expressed; any witnesses; conversations with the LADO, HR advisor and any other professionals such as the Police; decisions made and the rationale for them; and any action taken.

The individual making an allegation or reporting a low-level concern will be named in the written record. Where that individual requests to remain anonymous, that will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where the report could only have been made by one person; where a fair disciplinary investigation is needed; or where a later criminal investigation is required.

Concerns that are deemed to be low-level concerns will not be included in references unless a concern or group of concerns has been deemed by the LADO to meet the harm threshold and found to be substantiated.

## 29 PROFESSIONAL BEHAVIOUR

Staff must not misuse or misrepresent their position, qualifications or experience or bring the reputation of the charity into disrepute. Such behaviour may lead to disciplinary action. Serious safeguarding related allegations that are upheld will be referred to the Disclosure and Barring Service (DBS).

## 30 CRIMINAL ACTIONS

Staff must inform the CEO (Chair of Trustees if the employee is the CEO) immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution. The CEO or Chair will discuss the situation with the employee in the context of their role and responsibilities in order to help safeguard children, other staff and the charity's reputation.

## 31 DECLARATION OF INTERESTS

An employee is required to declare any situation whereby a group or organisation they are associated with would be considered to be in conflict with the ethos of the charity. Membership of a trade union or staff representative group would not need to be declared.

Staff should also consider carefully whether they need to declare to the charity their relationship with any individual(s) where this might cause a conflict with charity activities. For example, a relationship with a governor, another staff member or a contractor who provides services to the charity.

Failure to make a relevant declaration of interests is a serious breach of trust and therefore if staff are in doubt about a declaration, they are advised to take advice from their CEO.

All declarations, including nil returns, should be submitted in writing to the CEO on Register of Business Interests. (Appendix 1 – Pro Forma).

## 32 PROBITY OF RECORDS AND OTHER DOCUMENTS

The deliberate falsification of documents is not acceptable. Where an employee falsifies records or other documents, including those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence. Where an employee who has claimed any benefit, including housing benefit, either directly or indirectly and has failed to disclose their full earnings, this will be investigated as a potential allegation of gross misconduct and the employee may be dismissed and referred to the Police.

## 33 FINANCIAL INDUCEMENTS

Staff should familiarise themselves with the regulations but some of the principal employee requirements are summarised below.

### 33.1 BUSINESS CONTACTS

"Business contact" refers to any person, body or organisation with which the charity is involved on a financial or charitable basis (including contractors; developers; consultants; regional or national charities). This also includes business contacts who are potential suppliers (e.g. they are tendering for future business).

### 33.2 DECLARATION OF GIFTS

Any gifts that are received should be declared in writing to the trustees on the Register of Gifts and Hospitality (Appendix 2 – pro forma) with the exception of those items specifically identified in sections below. This document shall remain available for inspection by the Board. See also section 11 of this policy.

### 33.3 GIFTS OR HOSPITALITY TO STAFF OR THE CHARITY

Where a business contact offers a personal gift, personal payment or other incentive such as secondary employment to an employee, these should not be accepted and should be returned with a suitable official letter. Such offers should be declared to the Board and recorded in the Register of Gifts and Hospitality.

If it is not possible to return gifts then the employee who deals with that supplier should declare the gift to the Board who will keep a record of it and decide how it is to be used. Such gifts remain the property of the charity and should be included in the Register of Gifts and Hospitality.

The only exceptions to these are:

- Low cost, functional items suitable for business use rather than personal use and displaying the supplier's logo e.g., diaries, calendars and pens. These items may be accepted and do not have to be included in the Register of Gifts and Hospitality.
- Gifts offered by parents or children to staff to express their thanks, such as boxes of chocolates. However, only gifts with an individual value of £25 or less may be accepted. Such gifts do not have to be declared in writing or be included in the Register of Gifts and Hospitality.
- For the avoidance of doubt staff must always refuse gifts of money.

Offers of hospitality to specific events, such as a dinner or sporting event, should only be accepted after authorisation from the Board. These would normally only be approved where there is a clear and demonstrable benefit to the charity and the hospitality would not expose the charity to criticism that the business contact was exerting undue influence. These should be recorded in the Register of Gifts and Hospitality.

Where hospitality in the form of meals and drinks is offered by a business contact, this is only acceptable where it forms part of a normal business meeting (for example, refreshments at training events or meals at evening meetings.

Visits by staff to exhibitions, demonstrations, conferences, business meals and social functions in connection with the Lifespace's business and authorised by the charity, shall be at the charity's expense.

## 34 OTHER EMPLOYMENT

Subject to para 33.3 above, staff are permitted to take up secondary employment outside the charity as long as the activity does not constitute a conflict of interest, adversely affect their primary employment at the charity or exceed the legal maximum working week of 48 hours as defined by the Working Time Regulations. The secondary employment must be undertaken outside the working hours of the employee's normal post and staff are required to keep the CEO (Board if the employee is the CEO) informed of their employment by other organisations.

## 35 HEALTH AND SAFETY

Staff must adhere to the charity's Health and Safety policy, procedure and guidance and must ensure that they take every action to keep themselves and everyone safe and well.

This includes taking immediate safety action in a potentially harmful situation by complying with statutory guidelines and collaborating with colleagues, agencies and the Local Authority.

## 36 USE OF ALCOHOL AND ILLEGAL DRUGS

The taking of illegal drugs or alcohol during working hours is unacceptable and will not be tolerated. All staff are expected to attend work without being under the influence of alcohol or illegal drugs and without their performance being adversely impacted by the consumption of alcohol or illegal drugs. If alcohol or drug usage impacts on an employee's working life, the charity has the right to discuss the matter with the staff member and take appropriate action (disciplinary/capability procedures), having considered factors such as the charity's reputation and public confidence in the charity or individual.

Lifespace acknowledges addiction as a health-related issued and refer to our *Absence Policy*.

## 37 USE OF LIFESPACE PREMISES, EQUIPMENT & COMMUNICATION SYSTEMS

Lifespace equipment and systems (phone, email and computers) are available only for charity-related activities and should not be used for the fulfilment of another job or for personal use. This is unless authorised by the CEO (NB for the CEO this is the Chair); in case of an emergency, or where used for brief periods outside of working hours.

This includes photocopying facilities, stationery and premises. It also applies to access provided for remote use (e.g. handheld portable devices etc.) and to staff working outside of Lifespace premises and using their own IT equipment.

Illegal, inappropriate or unacceptable use of charity equipment or communication systems may result in disciplinary action and in serious cases could lead to an employee's dismissal.

This list is not exhaustive and includes:

- creating, sending or forwarding any message that would reasonably be considered inappropriate or unacceptable;
- committing or implying commitment to any contractual arrangements;
- accessing, publication or circulation of illegal, offensive, inappropriate or non-work-related material;
- any illegal activities;
- posting confidential information about the charity and/or staff, children or parents on social networking sites;
- gambling or gaming;
- unauthorised use of charity facilities (or employee's personal IT equipment), for personal use during employee's working time.

Staff receiving inappropriate communication or material or who are unsure about whether something she/he/they proposes to do might breach this policy should seek advice from their CEO.

The charity has the right to monitor Emails, phone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses but also to ensure proper and effective use of systems. Communication systems may be accessed when the charity suspects that the staff member has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

Passwords should not be shared and access to computer systems must be kept confidential. Breach of this confidentiality may be subject to disciplinary action. Where appropriate the charity should consider a system of proxy access. Any charity equipment that is used outside of Lifespace premises, for example laptops, should be returned when the employee leaves employment or upon request by the CEO.

## 38 RELATED LIFESPACE POLICIES

- Absence Policy
- Bullying Policy
- Child Protection and Safeguarding Policy
- Conflict Of Interest Policy
- Complaints Policy
- Disciplinary Policy
- Expenses Policy
- Grievance Policy
- Lone Working Policy
- Online Safety Policy
- Recruitment Policy
- Supervision Policy
- Whistleblowing Policy
- Remote Mentoring Guidance

## 39 REFERENCE SOURCES

This policy has been developed in accordance with the principles established by the Children's Act 1989, the Education Act 2002 and the Children's Act 2004 and in line with statutory guidance.

Below are all references and clarifications noted within the policy.

[1] The duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a child or young person involved in any activity, or interaction for which that individual is responsible. Any person in charge of or working with children and young people in any capacity is considered, both legally and morally, to owe them a duty of care.

[2] Working Together to Safeguard Children - A guide to interagency working to safeguard and promote the welfare of children - DfE 2026

[3] Keeping Children Safe in Education - statutory guidance for schools and colleges – DfE 2026

[4] Children Act 1989

[5] Health and Safety at Work Act 1974 Part I, Section.7

[6] Sexual Offences Act 2003
[7] Grooming – the act of gaining the trust of a child so that some form of abuse or exploitation can take place
[8] If the CEO has the concern that a young person is becoming infatuated with them, they should report this to the Chair.
[9] Sexual Offences Act 2003: abuse of a position of trust
[10] https://www.safeguardingwarwickshire.co.uk/images/downloads/ESS-PB/PoliciesandProcedures/Images-of-Children-Guidance-Dec-2014.pdf
[11] Further advice re: how staff should respond when finding indecent images of children can be found at https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
[12] Keeping Children Safe in Education (DfE 2026)
[13] In the event of any member of staff having concerns about the headteacher/principal breaching this code of conduct or abusing a child, they should contact the CEO without delay.

## APPENDIX 1: DECLARATION OF INTERESTS FORM

**Trustees and staff declaration form**

**I wish to declare the following information in accordance with the Boards's requirements**

**that a Register of Business Interests should be maintained.**

### Declaration of Interest Form

Please find below details of my interests in accordance with Lifespace Trust's Conflict of Interest Policy (updated 2024).

| **Category** | **Please give details of the interest and whether it applies to yourself or where appropriate, a connected person** |
|---|---|
| Current employment and any previous employment in which I continue to have a financial interest. | |
| Appointments (voluntary or otherwise) e.g. Trusteeships, directorships, local authority membership, tribunals etc. | |
| Membership of any professional bodies, special interest groups or mutual support organisations. | |
| Investments in companies, partnerships and other forms of business, major shareholdings, beneficial interests where these are considered (acting reasonably) to constitute a potential conflict of interests. | |
| Any contractual relationship with Lifespace. | |
| Ownership of any property that could create a conflict of interest. | |
| Any other conflicts that are not covered above where there could be perceived to be conflicts of interests. | |
| Gifts or hospitality offered by external bodies or Lifespace supplier and whether this was declined or accepted, e.g. attended dinner sponsored by Lifespace supplier. | |

Signed:

Name:

Date:

## APPENDIX 2: REGISTER OF GIFTS AND HOSPITALITY

**Trustees and staff declaration form**

**I wish to declare the following information in accordance with the Board's requirements that a Register of Gifts and Hospitality should be maintained.**

| |
|---|
| **Name:** |
| **Post:** |
| **Signature:** |
| **Date:** |
| **You should provide full details of your declaration below, including a nil return:** |
| **Declaration of gifts and hospitality:** |
| **Date gift received:** |
| **From whom Gift or hospitality received:** |

This Policy is communicated to all staff, trustees suppliers and sub-contractors. It will be published on our website and made available to interested parties.

| | | |
|---|---|---|
| Date of Issue: August 2026 | Signed: | Joanna Broughton<br>DSL |
| | Signed: | Chris Hall<br>Safeguarding Trustee |
| Date of Next Review: August 2027 | | |
| Policy Owner | Designated Safeguarding Lead | |