



Staff code of conduct

Safeguarding – Staff Code of Conduct (Written to comply with DfE statutory guidance – Keeping children safe in education, September 2025)

Introduction

New Level Academy and their staff form part of the wider safeguarding system for learners. Everyone who encounters children, and their families and carers have a role to play in safeguarding children. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy 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
- Taking action to enable all children to have the best outcomes.

This code has been drawn up to assist staff in maintaining entirely proper and professional relationships with learners. It attempts to provide a clear and unambiguous picture of the boundaries associated with staff roles and the use of power and authority. As well as protecting the learners we meet, the code of conduct will help staff avoid situations that might lead to allegations against them. As an employee working with learners, staff are required to demonstrate high standards in their exercise of authority, management of risk, the proper use of resources and in the active protection of learners from discrimination and avoidable harm.

This code of conduct should reassure other parties such as parents, schools and the Education Authority that a clear strategy exists to safeguard learners. This code of conduct applies in a context where any of the following are true:

- A learner is currently placed at New Level Academy
- A learner was formerly placed at New Level Academy and is still under the age of 19 years old;
- A learner who is a current or former under the age of 19 years old, attending non-New Level Academy activities (such as youth group organised together with the Partner Club or church).

New Level Academy expect all staff to take full responsibility for their conduct. Failure to adhere to the principles and guidelines of this code of conduct could constitute a breach of contract leading to disciplinary procedures, a consequence of which may be immediate dismissal. Keeping Children Safe in Education 2023. All those working regularly with children in New Level Academy must read 'Keeping Children Safe in Education – Part 1 (DfE 2025)', which sets out what all staff need to know, what they need to look out for and where they should report their concerns. Where appropriate, staff or volunteers not working directly with children may instead read 'Keeping Children Safe in Education – Annex A (DfE 2025)', which contains a condensed version of the information in KCSIE Part 1. This guidance should be read in conjunction with the school's safeguarding and Child Protection Policy, which sets out specific local arrangements and known local issues.

Guidelines for all staff New Level Academy staff have a duty to:

- Train and educate learners assigned to them according to the learning needs of those learners
 - Promote the general progress and well-being of individual learners and of any class or group assigned to them
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Ensure the health and safety of all learners while they are within their responsibility

- Provide advice and guidance to learners on educational, personal and social matters including providing information about sources of more expert advice on specific questions
- Maintain and promote the development of good behaviour management among learners.

Staff members should consider the learner's well-being by respecting and attempting to understand the following:

- The ascertainable wishes and feelings of the child/young person concerned (considered in the light of his/her age and understanding)
- The learner's physical, emotional, spiritual and learning needs
- The likely effect on the learner of any change in his/her circumstances
- The learner's age, gender, background, and any other relevant characteristics
- Any harm that the learner has suffered or is at risk of suffering
- Staff members are in a position of trust, and they have a duty of care to the learner for whom they are responsible.

Staff should never seek gratification of their own emotional and physical needs in their relationships with learner and relationships must always be professional, appropriate and justifiable.

The following principles provide the basis for our organisation to identify and manage inappropriate behaviour by our staff and should therefore be accessible to all members of staff. General relationships with learners. Staff should ensure that their relationships with learners are appropriate to the age and gender of the learners, taking care that their conduct does not give rise to comment or speculation.

Attitudes, demeanour and language all require care and thought, particularly when dealing with adolescent boys and girls. Comments by staff to children/young people, either individually or collectively, can be misconstrued. As a general principle, staff must not make unnecessary comments to and/or about learners, which could be construed to have a sexual connotation.

It is also unacceptable for staff to introduce or to encourage debate amongst children/young people in class, training situation or elsewhere, which could be construed as having a sexual connotation that is unnecessary given the context of the training session or the circumstances. However, it is recognised that a topic raised by a learner is best addressed rather than ignored. Staff should be careful in their use of language/terminology that may be misconstrued.

The systematic use of insensitive, disparaging or sarcastic comments such as those that refer to a child/young person's body, intelligence or ethnicity in any way are always unacceptable. Staff should encourage and praise learner as appropriate. If a member of staff feels that a learner is developing a crush or infatuation it is their responsibility to discuss the situation with the principal. When a member of staff has a pre-existing relationship with a New Level Academy learner and their family or friends this must be disclosed to the principal without delay. Any contact which occurs with the learner/their family/friends whilst they are a New Level Academy learner and afterwards until the young person is aged 19, is deemed to come under the scope of this policy.

The member of staff has a responsibility to ensure that any and all contact with a learner, and their family/friends, through a pre-existing relationship is disclosed to the principal without delay. When a learner or their family/friends attend a group/church where the staff member also attends, it is advised that staff always remain conscious of their professional relationship with the learner/family/friends. It is the staff member's responsibility to ensure that relevant people who have pastoral/leadership responsibility within the group/church for the learners (including the learners' parent/carer), are aware of the professional relationship and hold the staff member accountable for their conduct.

If a former learner under the age of 19 requests ongoing support from a member of staff, the staff member must continue to follow this code of conduct to be vigilant of the need to remain professional and ensure their safety and the learner's safety.

Meetings with learners

Staff should be aware of the potential risks which may arise from interviewing individual learners people in private. It is recognised that there will be occasions when confidential interviews must take place but such interviews should be conducted in a room with visual access or with the door open, or in a room or area which is likely to be frequented by other people.

Where such conditions cannot apply, staff are advised to ensure another adult knows that the interview is taking place. The use of “engaged” signs or lights are not advisable and where possible another learner or another adult should be present or nearby during the interview. If it is necessary to detain a learner for any length of time after the end of normal hours, prior warning must be given to the learner’s parents/carers or referrer.

Meetings with learners away from New Level Academy premises should not take place unless specific approval has been obtained from those responsible for the learners. This includes for attendance at non-New Level Academy activities such as youth group organised by the partner organisation or a local church. If such a meeting is planned, New Level Academy staff should obtain permission from the learner’s parent/carer, referrer and the principal. If the principal is not available, then permission may be obtained from the DDSL. If it is not possible to obtain permission the meeting is not to proceed and should be rearranged once permission has been granted. Staff should not take learners alone in a car journey however short. Unplanned social contact Social contact with learners other than that which is school based or organised by a school, should be positively resisted.

It is recognised that there may be occasions when accidental or reasonable social contact may be unavoidable, e.g., meeting learners at social venues open to the public or in shops or at private parties. In such circumstances, staff should be mindful of all times of their professional relationship and inform their line manager as soon as possible after the event.

Social media and communication

Under no circumstances should a member of staff give out their personal contact details (including phone numbers) to a learner, or their family/friends. Furthermore, staff should not use a personal phone to contact a learner.

Staff should not have a young person’s contact details stored on their phone. Staff must not use their personal phone to have contact with a learner or former learner until the learner reaches the age of 19. Centre managers and some senior staff will be provided with a company phone.

This phone is to be used only in a professional capacity and not for personal conversations with learners or their family/friends.

Facebook and other social networking sites are not to be used as a means of communicating with young people and their family/friends. Any requests by a learner or their parent/carer to be a ‘friend’ or linked with a staff member is not to be accepted.

If a learner or their parent/carer “follows” a member of staff on social media, the follower should be blocked. When a learner or their friends/family makes repeated requests, this must be reported to the principal without delay.

Staff are responsible for ensuring that learners and their friends/family are not able to access their personal details, including photos, online.

Staff who use social networking sites must ensure that they maintain the maximum privacy levels enabled. No member of staff will have contact via Facebook or other social networking sites until the learner has reached the age of 19.

If staff chooses to participate in online gaming or other online activities which enable 'chat' to take place they must never enter conversation with a learner through this. If a young person does attempt contact through this media the staff must maintain professional boundaries and inform the principal of what happened, without delay.

Acceptable use of technologies

Technology plays an important role at New Level Academy. It is often used within lessons and for remote learning as a central resource to help with the educational development of our learners. It also helps with the administrative side of our work with learners.

At New Level Academy, we understand the responsibility to educate our learners on e safety issues; teaching them appropriate behaviour and skills to enable them to remain both safe and legal whilst using technology at New Level Academy and at home.

New Level Academy's E-Safety Policy aims to highlight some of the issues and risks associated with ICT and provides guidance on how ICT should/could be used. Acceptable Use Agreements must be signed by staff, parents and learners to confirm they understand and are acting to minimise the risks.

Physical contact

As a general principle, staff should not engage in physical contact with learners. There may be very limited occasions when a child/young person needs comfort or reassurance, which may include physical comforting. Any such contact should be appropriate and sensitive to the learner's wishes and feelings and should be a response to an exceptional situation. There should be no unwanted physical contact, however well intentioned. It is recommended that some learners require assistance due to a disability, however such contact must always be acceptable to the learner and be within their agreed plan of care.

New Level Academy staff must be aware that any physical contact must be misconstrued by a learner, parent/carer or observer. Such contact can include well intentioned informal and formal gestures such as putting a hand on the shoulder or arm, which, if repeated with an individual learner, could lead to serious questions being raised.

Some staff are likely to come into physical contact with learners from time to time in the course of their training activities, for example when showing a learner how to use a piece of apparatus or equipment. Staff should be aware of the limits within which such contact should properly take place and should consider the possibility of such contact being misinterpreted by the learners.

Staff should never engage in 'horse play' or fighting with learners. Any form of physical punishment of learners is unlawful, as is any form of physical response to misbehaviour unless it is by way of restraint. It is particularly important that staff understand this both to protect their own position and that of the organisation. There may be occasions where the only option to prevent a learner from inflicting injury to himself/herself or others is for members of staff to perform a physical restraint.

In such cases, if possible, the restraint should be carried out by CPI-trained staff. The minimum force necessary must be used and any action taken must be to restrain only. Where members of staff have taken action to restrain a learner, they should report the matter to the principal and the incident must be recorded in the Incident Book.

The practice of physical intervention Physical intervention: can be defined as the "reasonable application of the minimum necessary force to overpower a child/young person with the intention of preventing them from harming themselves or others, or from causing serious damage to a property".

Physical intervention should only be used exceptionally, when all non-physical interventions (such as removing other learners and staff from the room) have failed. It should be primarily for the benefit of the child/young person/s and though immediate, should as far as possible be a considered response. Physical intervention should not be used as a form of punishment, or in normal circumstances, to enforce compliance with instructions.

It should not be attempted where the member of staff is put at undue risk. Incidents of physical intervention should be subject to debriefing of staff involved and lead to a review of strategies for managing the behaviour of learners. All incidents should be comprehensively recorded in line with New Level Academy's Incident reporting Policy. Where staff themselves are the subject of physical attack by learners or their parents/carers, they should follow guidelines in reporting and discuss the incident with the principal. Where physical intervention is deemed necessary it should only be used as a very last resort where a threat of danger to a learners or others is greater than the intervention. Sexual contact or relationships.

There is NO acceptable behaviour that has either explicit sexual connotations or innuendo. Any such behaviour will always be treated as extremely serious and must be reported immediately. If an older learner is in a position of authority, influence or trust over learners.

New Level Academy considers that it is inappropriate for them to become involved in a sexual relationship with a learner under the age of 19, even if they are both over the age of consent. Staff should not enter a sexual relationship with any New Level Academy learner, including any former New Level Academy learner until they are aged at least 19 and at least three years have passed following the date they finished their New Level Academy placement.

Provision of advice and guidance

Staff may from time to time be approached by learners for advice and may also appear distressed, and staff may feel the need to ask if all is well. In such cases staff must judge whether it is appropriate for them to offer counselling and advice or whether to refer the learner to a member of staff of another gender or to one with acknowledged expertise, experience or responsibility for responsibility for that learner.

Staff must in these circumstances use their discretion to ensure that the learner is not questioned to the extent that it is construed as an unjustified intrusion. Staff are advised never to stop a free-flowing account/disclosure of abuse but to make sure that at an appropriate point they inform the learner that they cannot keep such information confidential and need to tell someone else to get help. Example: 'Thank you for telling me, I now need to tell (where possible give the name and position of who will be told) so that we can get some help for you (and younger siblings).'

A learner may ask a member of staff to 'keep a secret', or to promise not to tell other people what they are about to tell them. Where this happens the member of staff must explain that they are not able to promise confidentiality as they may need to tell someone else if they are to help them. Where a learner is told by a member of staff that they cannot promise confidentiality, the learner may decide not to continue telling.

If a learner starts to say something and then stops, the member of staff needs to try to leave it open for the learners to come back to the discussion. The member of staff must still act, following the Child Protection procedures (see Child Protection Policy). It may be appropriate to refer the learner to available counselling/medical services, via their GP or a school/college-based service.

First aid and personal care

If a learner complains of injury or sickness, a judgement should be made as to whether he/she should be referred to a person qualified in First-Aid to see his/her own doctor. The learner's parents/carers should be also informed.

Staff who have to administer first aid (normally a trained First Aider) are advised that, wherever possible, another adult is present, if they are in any doubt as to whether necessary physical contact can be

misconstrued. Another adult should accompany staff who have to help learners with personal care. Learners should wherever possible, be encouraged to deal with such matters themselves. Where it is necessary to assist with/supervise dressing or undressing staff must be of the appropriate gender and be careful to protect the dignity of the learner.

Male staff should not, generally, enter female toilets nor should female staff enter male toilets, except in extreme situations such as fire, or where they may be a threat to life or limb. Reporting of incidents and low-level concerns It is important to create a culture of openness, trust and transparency and to work together to promote the highest standards of care for our learners. Staff are encouraged to share with the principal or proprietor, 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 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.

This will allow the principal to address any unprofessional behaviour and support the individual to correct it at an early stage. In addition, following any incident where a member of staff feels that his/her own actions have been, or may be, misconstrued, or where they believe they have behaved in such a way that they consider falls below the expected professional standards, the member of staff should report the matter to their manager.

Such reporting is especially important in any case where a member of staff should report the matter to their manager. Such reporting is especially important in any case where a member of staff has been obliged to restrain a learner physically to prevent him/her from inflicting injury to others or themselves, or where he/she has been personally attacked by another learner, parent or carer.

Whistleblowing

New Level Academy expects the highest standards of conduct from all employees and will treat seriously any concern that an employee may have about illegal or improper conduct. Employees will be expected, through agreed procedures and without fear of recrimination, to bring to the attention to the principal or Proprietor any serious impropriety or breach of procedure.

New Level Academy's policy on whistleblowing sets out when and how employees can notify the relevant person of any reasonable suspicion of illegal and/or improper conduct by a colleague. It sets out examples of illegal and/or improper conduct and actions that may be taken in response to a concern being raised.

This policy was created on	Signed on behalf of the organisation	Reviewed date
September 2025	T Springer	September 2026