

STAFF CODE OF CONDUCT POLICY

When acting in any capacity on behalf of Freedom Foundation, individuals should ensure that their own behaviour, and the manner in which they conduct themselves with colleagues, pupils, parents and other stakeholders, sets a positive and professional example. We recognise that the majority of staff members behave appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This policy forms part of a staff member's contract of employment and/or facilitator agreement and failure to comply with it, along with the associated Freedom Foundation policies, may result in disciplinary action being taken, including legal action where this is warranted.

Individuals should always follow the guidelines below when interacting directly with children and young people:

- Prioritise the safety and well-being of the child and/or vulnerable adult.
- Respect a participant's background, culture and traditions and be mindful of any behaviour that may offend his/her beliefs.
- Avoid one-to-one interactions with a child or vulnerable adult. If this is unavoidable, reduce the risks as much as possible by remaining in an open space and let somebody else know where you will be.
- Never be alone with a child or vulnerable adult in a room with the door shut.
- Always act within professional boundaries; ensure all contact with children is essential to the programme, event, activity, and/or project.
- Never give out your personal contact details, and do not 'friend' or 'follow' children or vulnerable adults you are working with on social networking sites.
- Do not consume alcohol or drugs when responsible for running an activity or programme.
- When attending events where young people are present e.g., celebration dinners, alcohol should only be consumed in moderation and should not impact on your behaviour or your ability to act within professional boundaries.
- Do not agree to meet a child outside of your professional capacity.
- Remember they are children first, and contributors or participants second.
- Never lose sight of the fact that you are with children - behave appropriately and use appropriate language always and challenge inappropriate language used by children.
- Listen to and respect participants always; don't patronise them.
- Avoid favouritism and treat children fairly and without prejudice or discrimination.
- Do not permit abusive activities amongst and/or directed towards young people (e.g., bullying, ridiculing, name-calling, exclusion, racism).
- Remember that abuse can be committed peer or peer, and all concerns should be reported.

1. PROFESSIONAL BEHAVIOUR AND CONDUCT

All Staff are expected to demonstrate consistently high standards of personal and professional conduct such that public confidence in their integrity is sustained.

All staff/ facilitators will be made aware of what classifies as appropriate and inappropriate behaviour, 'what a low-level concern is' and the importance of sharing low level concerns, how to record, report and respond to concerns.

LEVELS OF CONCERN

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the AP or students home school to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

STAFF WILL:

- Have proper and professional regard for the ethos, policies and practices of Freedom Foundation AP.
- Maintain high standards in their attendance and punctuality.
- Staff should ensure high standards of honesty and integrity in their role. This includes when dealing with staff, students, engaging in procurement activities, claiming expenses and using Freedom Foundation AP property and facilities.
- Cooperate with Freedom Foundation AP management and trust leaders in meeting their duties under the relevant regulations.
- Treat students, parents, colleagues and external contacts with dignity and respect.
- Observe proper boundaries appropriate to their professional position, showing tolerance of and respect for the rights of others.
- Inform Freedom Foundation Management or Directors if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.
- Be aware that professional behaviour and conduct is expected to be extended to extracurricular trips and visits.
- Act appropriately in terms of the views they express – in particular, political views.
- Appropriate use of Freedom Foundation AP resources at all times

STAFF WILL NOT:

- Allow concerns or allegations to go unreported
- Take unnecessary risks
- Patronise or belittle children and young people, staff or other workers
- Use offensive or abusive language.
- Perpetrate discrimination, bullying, harassment, victimisation or intimidation, including physical, sexual and verbal

abuse.

- Misuse or misrepresent their position, qualifications, or experience.
- Cause Freedom Foundation AP or Home School to be brought into disrepute.

2. STAFF DISCIPLINE

This policy is written in line with the Freedom Foundation Disciplinary Policy and Procedure.

These Disciplinary Rules should be read in conjunction with our Disciplinary Procedure set out in the Freedom Foundation Disciplinary Policy and Procedure. The aim of the Rules and Procedure is to set out the standards of behaviour expected of all staff and to provide a framework within which managers can work with their teams to maintain these standards and encourage improvement where necessary.

It is Freedom Foundation's policy to ensure that any disciplinary matter is dealt with fairly and in accordance with the Disciplinary Procedure.

If you are in any doubt as to your responsibilities or the standards of conduct expected of you, you should speak to your manager.

Misconduct is defined as:

'Unacceptable or improper behaviour, especially by an employee or professional person'

The following is a guide to conduct that may be regarded as lesser misconduct. A member of staff will not normally be dismissed for a first breach of discipline in cases of lesser misconduct but may receive a sanction in the form of a warning. Should the lesser misconduct be repeated, it may result in a more severe sanction under the lesser misconduct process or a referral to the SLT Management Team where it constitutes gross misconduct.

This list is intended as a guide and is not exhaustive: -

- Unauthorised absence and/or poor time keeping.
- Refusal/failure to carry out a reasonable instruction.
- Failure to adhere to the policies and procedures.
- Deliberate or wilful unsatisfactory standards of work.
- Disorderly behaviour whilst on duty.
- Negligence causing injury or damage to property.
- Using information obtained in the course of employment for personal gain or benefit.
- Being inappropriately involved in decisions relating to discipline, promotion or pay adjustments for any employee who is a relative, partner or close friend.
- Failing to meet obligations with regard to secondary employment.
- Bullying, harassment.
- Breach of specific codes of practice or legislation.
- Failure to follow the AP's Safeguarding policies and procedures.
- Using public funds entrusted to them in an irresponsible and unlawful manner.
- Accessing the internet for non-work-related purposes during working hours without consent.
- Inappropriate comments and use of social networking sites such as Twitter, Facebook or YouTube.
- Inappropriate texting.
- Inappropriate conduct in the workplace.
- Breach of confidentiality or General Data Protection Regulations (GDPR).

Gross misconduct is defined as:

'Unacceptable or improper behaviour of a very serious kind, especially by an employee or professional person'

Gross misconduct is a serious breach of contract and includes misconduct which, in our opinion, is likely to prejudice our business or reputation or irreparably damage the working relationship and trust between the employer and employee. Gross misconduct will be dealt with under our Disciplinary Procedure and may result in dismissal without notice or pay in lieu of notice (known as summary dismissal).

All gross misconduct allegations will be subject to a formal disciplinary hearing before the chair (an appointed manager or other nominated person).

This list is intended as a guide and is not exhaustive.

The following are examples of matters that are normally regarded as gross misconduct:

- Specified conduct that is incompatible with the Freedom Foundation ethos and vision of the provision as set out in Freedom Foundation's AP policies and procedures, website, AP staff terms and conditions of employment, etc.
- Fraudulent acts or theft of property belonging to the Local Authority, the site premises, Freedom Foundation AP, fellow members of staff or students.
- Theft or fraud in and out of the workplace.
- Deliberate and serious damage to property belonging to the Local Authority, the site premises, Freedom Foundation AP, fellow staff or students.
- Violent behaviour, including physical assault.
- Bullying, harassment or unlawful discrimination on any grounds.
- Sexual misconduct at work.
- Gross negligence.
- Causing loss, damage or injury through serious negligence.
- Serious incapability at work brought on by alcohol or other illegal substances on Freedom Foundation AP premises.
- Serious insubordination.
- Deliberately accessing offensive or obscene material via internet sites, social networking sites or by messaging.
- Inappropriate texting.
- Dishonesty
- Serious violation of the Local Authority or Freedom Foundation AP health and safety rules and standards.
- Criminal misconduct outside the workplace which reflects adversely upon Freedom Foundation AP or the member of staff's suitability to continue to be employed at the provision.
- Serious or deliberate falsification of the Local Authority or Freedom Foundation AP documents or provision of false information to the Local Authority or Freedom Foundation AP.
- Knowingly providing false information on any matter relating to the member of staff's employment.
- Breach of confidentiality or General Data Protection Regulations (GDPR).
- Breach of specific codes of practice or legislation.
- Failing to disclose any financial or non-financial interests that could be considered as conflicting with the Freedom Foundation AP/Local Authority's interests.

If the allegation involves potential criminal activity a referral will be made to the police. If this happens a member of the Senior Management Team (SLT) will normally take no further action until the matter is referred back to them to complete the disciplinary process. The police will also be asked to agree what information can be released to the member of staff.

Formal Investigation

As soon as an allegation has been brought to the attention of the Head of provision or nominated Chair a full investigation will be carried out.

Where the allegation is about a member of staff, the investigation will be undertaken by a member of the Senior Leadership Team. Where the allegation is about the Head of provision the nominated Chair will, where possible, arrange for the investigation to be carried out externally, i.e. by the Local Authority, or the Freedom Foundation Directors.

The member of staff will be advised of their right to object to any investigator. It will be for the Head of provision or nominated Chair to determine whether the circumstances of the objection are valid and accepted.

The Investigating Officer will seek advice and support from the Local Authority HR & OD Service (as appropriate) throughout the investigation process.

The investigation will include gathering all evidence, interviewing all witnesses (including those identified by the member of staff), considering all the facts and producing a report. The member of staff will be given the opportunity to respond to the allegation and will be advised of their right to be accompanied by a work colleague or a representative of their Trade Union at an investigation interview meeting. Witnesses are also entitled to be accompanied by a work colleague or a representative of their Trade Union when giving evidence.

No undertaking of confidentiality will be given to witnesses; however, the overall confidentiality of the disciplinary process will be respected.

Once the investigation has concluded, the investigating officer will produce a written report and present the findings to the Head of provision or the nominated Chair. This will be done as soon as practicable after the conclusion of the investigation. The investigating officer's report should be factual and objective and based on evidence gathered. It should not contain expressions of personal opinion or judgement on the part of the investigator relating to evidence, witnesses or the staff member under investigation. The report should not contain recommendations or conclusions as to what action should be taken.

The investigating officer should:

- Be clear about the nature and content of the allegation.
- Read all the documentary evidence.
- Define the areas to be investigated and the parameters of the investigation.
- Draw up lists of people to be interviewed and the order of the interviews.
- Ensure that the investigation is thorough but seek to avoid interviewing more people than strictly necessary.
- Draw up a list of issues/topics to be raised in the interviews to clarify the allegations.
- Use a note taker and/or to record interviews (in the latter case having sought the agreement of the person being interviewed).
- Consider whether translation or interpretation facilities are required.
- Consider accessibility issues.
- Consider confidentiality issues.
- Ensure all interview notes are written up and signed and dated.
- Produce a report in accordance with the investigation framework set out below.
- Submit all documents to the Head of provision or the nominated Chair and another governor where the allegation is against the Head of provision.
- Maintain a record of all documents. This record (list of contents) should be released to all parties along with all evidence should the matter proceed to a hearing.

To avoid any duplication of interviews the suggested order for interviews is:

- The person making the allegation.
- Their witnesses.
- The member of staff against whom the allegation has been made.
- Any witnesses identified by them.
- Any other individual as deemed relevant by the investigator.

The investigator should not give undertakings of confidentiality to those making allegations or being interviewed. Evidence compiled in the investigation must be made available to the parties in any subsequent disciplinary proceedings and those giving evidence should be informed before giving their evidence that this will happen.

The point at which the member of staff is first interviewed by the investigator will depend on the nature of the allegation(s) made and whether other procedures have been triggered (for instance there may be a delay if the matter is being investigated by the statutory authorities).

In the case of the investigation being conducted by an independent investigator, they should not investigate any matter(s) that are not included within the terms of reference issued by the Head of provision or nominated Chair. If the investigator is asked to investigate or otherwise identifies additional issues, they should immediately contact the Head of provision or nominated Chair and await instructions about how to proceed. The Head of provision or nominated Chair should seek advice from the Local Authority, HR & OD Service on any additional issues raised and how to proceed.

Completion of investigation – investigation outcome

Based on the evidence and findings within the investigating officer's report the Head of provision or nominated Chair may conclude that:

- The allegation is false or unfounded and no further action will be taken.
- Matters can be dealt with through an informal discussion
- There appears to be sufficient evidence of misconduct for a hearing before the Head of provision or nominated Chair.

- There appears to be sufficient evidence of misconduct for a hearing to take place but, because the member of staff currently has a written warning, the case should be referred to the Staff Disciplinary Procedure. (set out in the Freedom Foundation Disciplinary Policy and Procedure.
- There appears to be sufficient evidence that the allegation constitutes potential gross misconduct to be considered at a disciplinary hearing before the **SLT Management Team**. The head of provision or nominated Chair will seek advice from the Local Authority HR & OD Service (as appropriate) when making their determination. The member of staff (and their Trade Union representative if requested by the member of staff) should be informed in writing as soon as possible what action, if any, will be taken following the investigation.

Disciplinary Procedure

It is our policy to ensure that any disciplinary matter is dealt with fairly and consistently and that steps are taken to establish the facts and to give members of staff the opportunity to respond before taking any formal action.

This procedure has the following aims:

- To ensure that all disciplinary matters are dealt with in a consistent and fair manner.
- To ensure that any disciplinary action is only taken after a full investigation of all the facts.
- To ensure that you receive reasonable written notice of the times/dates of a disciplinary/appeal hearing and the allegations against you.
- To ensure that, at each stage of the disciplinary procedure (including appeal), you have the opportunity to put forward your case.
- To ensure that you have the right to be accompanied at all formal stages of the disciplinary procedure.
- To ensure that you receive appropriate written confirmation of any disciplinary action taken against you; and,
- To ensure that you are given the right of appeal.

This procedure is used to deal with misconduct; it does not apply to cases involving genuine sickness, proposed redundancies, or poor performance. In those cases, reference should be made to the appropriate policy or procedure which may include **Staff CPD and Performance Management, Safeguarding Policy**.

It is hoped that minor conduct issues can be resolved informally between you and your manager. Such discussions should be held in private and without undue delay whenever there is cause for concern. Where appropriate, a note of any informal discussions may be placed on your personal file but will be ignored for the purposes of any future disciplinary hearings. Formal steps may be taken under this procedure if the matter is not resolved, or if informal discussion is not appropriate (for example, because of the seriousness of the allegation).

If you have difficulty at any stage of the procedure because of a disability and/or health related concerns, you should discuss this with your manager as soon as possible.

The six possible outcomes in relation to the disciplinary procedure are:

- Informal discussion
- A first written warning – [live for 6 months].
- A second written warning – [live for 12 months].
- A final written warning [live for 18 months].
- A referral to a disciplinary hearing before the Freedom Foundation Directors.
- The allegation is not upheld.

Full details of the above outcomes, procedures and right to appeal can be found in the Freedom Foundation Disciplinary Policy and Procedure.

3. SAFEGUARDING PUPILS

In accordance with the current '[Keeping children safe in education](#)' (KCSIE), staff have a responsibility to safeguard pupils, protect and promote their welfare, and ensure that they provide a learning environment in which pupils feel safe, secure and respected.

To effectively safeguard pupils, staff are required to follow the procedures outlined in this Staff Code of Conduct, the Behaviour Policy and the Child Protection and Safeguarding Policy and ensure that they do not act in a way that may put pupils at risk of harm, or lead others to question their actions.

Copies of policies and a copy of Part one (or, where appropriate **Annex A** for staff not working directly with children) of KCSIE will be provided to **staff at induction**. Staff will have a clear understanding of the Freedom Foundation's AP policies and procedures with regards to safeguarding issues, e.g. abuse, and the important role they play in preventing harm against pupils.

If a member of staff has any concerns about a pupil's welfare, they will act on them immediately. They will follow the necessary reporting and referral procedures outlined in the Freedom Foundation Safeguarding Policy and speak to the DSL. Staff will be aware of the procedures to follow if a pupil tells them they are experiencing abuse, exploitation, or neglect.

Any member of staff that has concerns about another staff member's (including volunteers and supply staff) actions or intent or believes these actions may lead to a pupil being put at risk of harm, will report this in line with Staff Allegations and Safeguarding Concerns within the Safeguarding Policy or Whistleblowing Policy immediately so appropriate action can be taken.

4. HOW TO RAISE A CONCERN

A worker may find it easier to raise the matter if there are two (or more) staff who have had the same experience or concerns. The earlier concerns are expressed the easier it is to take action. A worker may wish to speak to their trade union representative or colleague(s) before making a disclosure.

Staff need to be aware that their colleagues are bound by the same obligations, as they are themselves, relating to confidential information. If a worker shares confidential information with union representatives, professional associations or others with a view to using this procedure they will need to ensure that the confidential information is not used inappropriately.

The Public Interest Disclosure Act provides protection where information is disclosed in the course of obtaining legal advice. Therefore, when seeking such advice, staff should ensure that in seeking the advice confidential information is not passed on to third parties.

The first stage requires concerns to be raised with the Head of Provision:

Nottingham AP– Simon Green simon.green@freedomfoundationuk.org

Derby AP – Anna Malik anna.malik@freedomfoundationuk.org

If the concern is about a Head of Provision or it is believed they may be involved in the wrongdoing, the worker should report their concern to the Directors.

Concerns may be raised verbally but best practice is for these to be raised in writing. Staff who wish to make a written report are invited to use the following format:

- the background and history of the concern (giving relevant dates)
- the reason why they are particularly concerned about the situation
- the fact that the worker is raising the concern under the whistleblowing complaints procedure.

Although a worker is not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern. Where possible, notes should be kept of what the worker has seen/heard/felt. Notes should be dated, and copies of all relevant information kept.

A trade union or professional association representative, work colleague or a friend may be present during any meetings or interviews in connection with the concerns raised.

5. INVESTIGATION

Freedom Foundation AP will respond to concerns. Freedom Foundation AP will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with

the appropriate policy/procedure

- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 5 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation

If there is:

- The recipient should then arrange a further investigation into the matter, involving Freedom Foundations SLT, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police
- The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

Some concerns may be resolved by agreed action without the need for investigation.

On occasions, urgent action may be required to be taken before any investigation is conducted.

Within ten working days of a concern being raised, the responsible person (the head of provision, or Directors in the case of a concern relating to the head of provision) will write to the worker:

- acknowledging that the concern has been received
- indicating how it is proposed to deal with the matter
- giving an estimate of how long it will take to provide a final response
- telling the worker whether any initial enquiries have been made
- supplying the worker with information on support mechanisms
- tell the worker whether further investigations will take place and if not, why not.

6. OUTCOME OF THE INVESTIGATION

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether a referral is required to an external organisation, such as the local authority or police. They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality. Beyond the immediate actions, the Head of Provision, SLT and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing. Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

7. ESCALATING CONCERNS BEYOND FREEDOM FOUNDATION AP

Freedom Foundation AP encourages all staff to raise their concerns internally, in line with section 7 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included [here](#)

The Protect advice line, linked to in section 01.6 of this policy, can also help staff when deciding whether to raise the concern to an external party.

8. DRESS CODE

All staff are expected to:

- Ensure that their appearance is clean and neat when at work or representing the Freedom Foundation AP.

- Dress in a manner that is appropriate to their role – Freedom Foundation AP will make reasonable adjustments to uniform expectations to suit disabilities, medical conditions, and religious and cultural beliefs.
- Not wear clothing that could have implications for the health and safety of themselves or others in their care.
- Remember that they are role models for students, and that their dress and appearance should reflect this.
- Not dress in a way that would cause embarrassment to students, parents, colleagues, or other stakeholders.
- Ensure that, if visible, tattoos do not cause offence to others; if tattoos are likely to cause offence, they must be covered up whilst in work.
- Ensure that jewellery and piercings are minimal and, in the health and safety interests of both staff and children, avoid anything that could catch or be caught by pupils.

9. ATTENDANCE

STAFF WILL:

- Attend work in accordance with their contract of employment and/or facilitator agreement and associated terms and conditions in relation to hours, days of work and holidays.
- Comply with the Freedom Foundation's AP notification of sickness absence procedures when they are absent from work due to illness or injury.
- Comply with the expectations of the Attendance Management Policy and all procedures that relate to this policy, including attending occupation health appointments when required.
- Maintain regular contact with the Freedom Foundation AP Management team during any period of absence.
- Make routine medical and dental appointments outside of their working hours or during holidays where possible.
- Refer to their Freedom Foundation Contract of Employment and/or Facilitator Agreement if they need time off for any reason other than personal illness.

10. SMOKING, E – CIGARETTES, ALCOHOL AND OTHER SUBSTANCES

Staff will not smoke or vape on Freedom Foundation AP premises and whenever in the sight of pupils, parents or visitors.

Staff will not smoke or vape whilst working with or supervising pupils off-site, such as when on educational visits and trips.

Staff will report for work and remain in a condition to perform their duties free from the effects of drugs, alcohol or any other substances that may hinder judgement and cause changes in behaviour; this does not include over-the-counter painkillers such as paracetamol.

11. CONDUCT OUTSIDE OF WORK

Staff will not engage in outside work which could seriously damage the reputation and standing of the Freedom Foundation AP, the employee's own reputation, or the reputation of other members of the Freedom Foundation community. Staff will also not engage in outside work at a level which may contravene The Working Time Regulations 1998 or affect an individual's work performance.

Staff committing offences that involve violence, possession or use of illegal drugs, or sexual misconduct is unacceptable, and will result in disciplinary procedures in line with the Freedom Foundation's Disciplinary Policy and Procedure.

Staff will not engage in inappropriate use of social network sites which may bring themselves, Freedom Foundation AP, Freedom Foundation's community or employer into disrepute.

12. HEALTH & SAFETY

STAFF WILL:

- Be familiar with, and adhere to, the Freedom Foundation's Health and Safety Policy and ensure that they take every action to keep themselves and everyone in the Freedom Foundation AP environment safe and well.
- Comply with health and safety regulations, adhering to any rules, routines and procedures in place, and cooperate with school leaders and colleagues on matters relating to health and safety.
- Use the correct equipment and tools for the job and any protective clothing supplied.
- Adhere to their common law duty to act as a prudent parent would when in charge of pupils.

13. CONFLICT OF INTEREST

The Freedom Foundation AP is aware that situations may arise where family interests or loyalties conflict with those of the Freedom Foundation; however, staff have an obligation to act in the best interests of Freedom Foundation AP to avoid situations where there may be a potential conflict of interest.

All staff will be able to demonstrate that they do not have a vested interest in any decision-making or budget spending. All declarations will be submitted in writing to Freedom Foundations board of advisors during our AGM's

Failure to make a relevant declaration of interests is a serious breach of trust and, therefore, if employees are in doubt about a declaration, they are advised to contact the Freedom Foundation Management team.

Any member of staff found to be withholding information about a conflict of interest will be subject to disciplinary action in line with the Disciplinary Policy and Procedure.

CONTACTS:

Staff members will not use Freedom Foundation AP's business contacts for acquiring materials or services at trade/discount prices for non-Freedom Foundation AP activities, unless participating in concessionary schemes arranged by trade unions or other such groups.

14. MAINTAINING PROFESSIONAL RELATIONSHIPS WITH PUPILS

FREEDOM FOUNDATION AP TRUSTS AND EXPECTS THAT STAFF WILL:

- Always maintain professional boundaries and relationships with pupils, and will consider whether their actions are warranted, proportionate, safe and necessary.
- Act in an open and transparent way that would not lead to others questioning their actions.
- Ensure that they do not establish social contact with pupils for the purpose of securing a friendship, or to pursue or strengthen a relationship.
- Ensure that they do not develop personal or sexual relationships with pupils: this includes sexual remarks and discussing their own sexual relationships with, or in the presence of, pupils.
- Only contact pupils via Freedom Foundation AP's established mechanisms: personal phone numbers, email addresses or social media platforms will not be used to contact pupils.

STAFF ARE AWARE THAT THEY MUST NOT:

- Discuss personal information with pupils, such as concerning their lifestyle or marital status, unless it is directly relevant to the topic being taught.
- Correspond in a personal nature through any medium with pupils, e.g. phone calls or text messages, unless it is within the staff member's role and via an approved communication method, e.g. Freedom Foundation emails.
- Adopt an ongoing support role beyond the scope of their position.
- Discuss or share information regarding other pupils or members of staff; staff should be aware of their

surroundings when speaking to others, as their conversations may be overheard.

- Ignore instances of sexual harassment and inappropriate behaviour amongst pupils.
- Invite or allow pupils to visit their home.
- Allow pupils to access staff members' personal devices.
- Attend pupils' homes or their social gatherings, unless approved by the SLT.
- Be alone with a pupil outside of teaching responsibilities, unless approved by the SLT.
- Enter changing rooms or toilets occupied by students, when supervision is not required or appropriate, use toilet facilities allocated to pupils, or undress in facilities intended for use by pupils.
- Carry out one-to-one tutoring, mentoring or coaching of students, unless approved by the Freedom Foundation Head of Provision or SLT.
- Give personal gifts or special favours, or disproportionately single specific pupils out for special duties or responsibilities.

If a pupil is consistently attempting to befriend or contact a member of staff on social media, the member of staff will inform Freedom Foundations Head of Provision as soon as possible.

Staff are strongly discouraged from forming personal relationships with former pupils, including on social media, as well as with the parents of any pupils on social media.

In the event of Freedom Foundation AP becoming aware of a close relationship between a member of staff and a former student which may raise concerns about their suitability to work with children, Freedom Foundation Head of Provision will contact the Home School and together they will decide on if action needs to be taken regarding the LA designated officer (LADO) seeking advice and guidance.

Freedom Foundation AP recognises that there may be circumstances whereby employees of the AP are known to pupils outside of work. Examples include friends and family connections, sports clubs and private tutoring. Staff must declare to the Freedom Foundation Head of Provision any relationships outside of school that they have with students which includes the students name(s) and their relationship.

APPROPRIATE LANGUAGE

STAFF WILL BE INFORMED THAT STUDENTS SHOULD NOT BE TREATED AS FRIENDS.

STAFF WILL NOT:

- Use inappropriate names or terms of endearment.
- Allow inappropriate conversations or enquiries of a sexual nature to occur.
- Comment on a student's appearance, including personal flattery or criticism.
- Treat pupils disrespectfully or discriminatorily, based upon their perceived or actual protected characteristics.
- Subject students to humiliation, profanity, or vilification.
- Allow or partake in suggestive humour, banter, jokes or innuendos of a sexual nature.
- Use obscene or inappropriate gestures and language.
- Partake in personal conversations, including on the phone, where this may be overheard by pupils.

15. PHYSICAL CONTACT WITH STUDENTS

All staff members will respect the personal space and privacy of all pupils and will avoid situations which unnecessarily result in close physical contact.

Freedom Foundation AP understands that there are circumstances in which it is entirely necessary for staff to have physical contact with students, e.g. when applying first aid and assisting with intimate care, but staff will only do so in a professional and appropriate manner in line with relevant school policies.

When physical contact is made with students, it is imperative that it is conducted in a way which is responsive to the student's needs, is of limited duration and is appropriate to their age, stage of development, gender, and background.

Staff will seek the student's permission, where possible, before initiating contact.

Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between students, and ensure that the student's feelings and wishes are always taken into account.

16. TRANSPORTING STUDENTS

Staff are aware that the safety and welfare of students is the responsibility of Freedom Foundation AP until students are with the home school or their parents. Freedom Foundation AP is committed to taking all possible safety measures to ensure the safety of pupils.

When it is necessary to transport students off-site, staff will gain consent from parents before transporting pupils and adhere to the appropriate Freedom Foundation AP policies and risk assessments. **The provision does not intend to take students off site and this will only happen if necessary to do so.**

STAFF WILL ENSURE THAT THEY:

- Hold a full valid driving licence for the category of vehicle being driven and providing their licence details to the head of provision where required.
- Drive in accordance with the laws of the road and Highway Code.
- Check before each journey that the vehicle is roadworthy, e.g. tyres are properly inflated and meet legal requirements.
- Ensure that they are fit to drive; where their fitness to drive may be impaired, e.g. due to a medical condition or taking medication, they inform their line manager as soon as possible and notify the DVLA where required.
- Notify the head of provision where there is any change in their circumstance in relation to driving at work, e.g. if they acquire penalty points on their licence for motoring offences outside of work.

Staff will only use their own vehicle to transport students where there is no practical or reasonable alternative and where agreed upon by the headteacher from the pupil's home school and parents in advance of the journey. Only members of staff with the appropriate level of DBS check and safeguarding and behaviour management training will be permitted to transport pupils.

When using their own vehicle to transport pupils, staff will ensure that their driving insurance is valid for the purposes of business use, including cover for persons travelling as business passengers. Two or more staff will be present in the vehicle to avoid any discrepancy regarding safeguarding concerns.

Staff will not offer pupils transport outside of their normal working duties, other than in an emergency or if a pupil is at risk. These circumstances will be recorded and reported to the **Freedom Foundation Head of provision and the pupil's Headteacher from their home school and their parents.**

17. ACCEPTABLE USE OF TECHNOLOGY

When using technology staff will always adhere to the various procedures, freedoms and limitations outlined in the relevant Freedom Foundation AP policies.

All staff will maintain a professional level of conduct in their personal use of technology, and read, sign, and adhere to Freedom Foundation AP Technology Acceptable Use Agreement.

Staff will be vigilant to ensure their own behaviour is respectful and that students are using technology appropriately while under their care.

Staff will not use personal mobile phones and laptops, or Freedom Foundation AP equipment for personal use, in

front of pupils or in provision times except in an emergency, or if the Head of provision had confirmed the use.

SOCIAL MEDIA

Staff will be aware that their conduct on social media can have an impact on their role and reputation within the Freedom Foundation AP and home school.

Staff will remain mindful of their use of social media and their web-based presence including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, the Freedom Foundation AP or provision community into disrepute.

Staff are required to employ the highest security settings on any personal profiles they may have.

Staff will not engage in inappropriate use of social networking sites including contacting students or their family members, accepting or inviting friend requests from pupils or their family members, or following students or their family members on social media.

Freedom Foundation AP understands that some staff are also parents of students at Freedom Foundation AP and, therefore, may wish to contact other parents. When doing so, staff will exercise their professional judgement and will not contact family members on social media if this would lead to a conflict of interest.

18. PHOTOGRAPHY/ IMAGES/ VIDEOS

Photographs, images and videos will only be taken using Freedom Foundation AP equipment – using personal mobile phones or personal devices for this purpose is prohibited and taking images of pupils will not be taken for personal use.

Staff will ensure that imagery and videos will be kept in an appropriate and secure place in Freedom Foundation AP. No pupil will be photographed in a state of undress or semi-undress, or in a situation which could be considered as indecent or sexual.

Staff will not take images of a pupil's injury, bruising or similar (e.g. following a disclosure of abuse), even if they have been requested to do so by children's social care and staff members will not make audio recordings of any disclosure made by a pupil.

Consent for taking photographs will be obtained from parents.

Careful consideration will always be given to the activities which are being filmed or photographed, to ensure that images or videos are not indecent and cannot be misused.

19. PREMISES/ EQUIPMENT AND COMMUNICATION

STAFF ARE RESPONSIBLE FOR:

- Being aware of site security by securing windows and doors when rooms are not in use.
- Ensuring that all visitors sign in and out at the Freedom Foundation AP premises.
- Challenging any unidentified individuals and notifying the Head of Provision of any unauthorised person.
- Securing valuable equipment after use.
- Ensuring the security of the Freedom Foundation AP equipment when taken off the premises, such as laptops.
- Reporting any minor security concerns to the Head of Provision.
- Reporting major security concerns directly to the police or emergency services, where appropriate.
- Being responsible for the security of any of their own property that they bring to Freedom Foundation AP site.

Freedom Foundation AP equipment and systems are available only for provision -related activities and will not be used for the fulfilment of another job or for personal use, unless specifically authorised by the head of provision.

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

The provision reserves the right to monitor emails, phone calls, internet activity or document production on Freedom Foundation AP -owned equipment, 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 provision suspects that the employee/ facilitator has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity.

20. DATA PROTECTION AND CONFIDENTIALITY

All staff will be aware of their responsibilities as laid out in the Freedom Foundation AP Data Protection Policy and in line with the core principles of the UK GDPR and the Data Protection Act 2018.

Staff members will not disclose sensitive information about the provision and its employees, or the LA to other parties. The only exception to this being when the confidential information gives rise to concerns about the safety or welfare of a pupil.

Before sharing data, all staff will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

Freedom Foundation AP holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

21. MONITORING AND REVIEW

This document will be reviewed on an annual basis by the Freedom Foundation AP Management team, and any changes made will be communicated to all members of staff.

All members of staff are required to familiarise themselves with this document as part of their induction programme

- Review of this Policy: April 2025
- Next Review Date: April 2026
- Reviewed By: Laura Grant
- Position/Role: Director of Freedom Foundation



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