Staff and Homestay Code of Conduct

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This policy is publicly available. It may be shared with parents, agents, partner schools and inspectors on request.

Document Control

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Statement

This code of conduct applies to all April Well Limited staff and, where applicable, to any homestays, emergency accommodation adults, approved accommodation arrangements, transfer providers or other third party contractors used or approved by April Well Limited in connection with student welfare, emergency support or direct contact with students. It gives clear guidance on the behaviour April Well Limited expects from adults working for or on behalf of the organisation. These guidelines confirm and reinforce professional responsibilities, help adults establish safe practices and reduce the risk of false accusations or improper conduct.

April Well Limited is a small guardianship organisation. Students supported by April Well normally live in boarding accommodation at their schools or with their parents. April Well Limited does not provide routine or long-term homestay accommodation. However, where necessary in clearly defined emergency or exceptional situations, April Well Limited may arrange or coordinate short-term emergency accommodation in accordance with its Emergency Procedure and safeguarding policies. References in this code of conduct to "homestays" include any host family, emergency accommodation adult or accommodation arrangement used or approved by April Well Limited.

Code of Conduct

Power and positions of trust

In your role as a member of staff, you will have power over students and will hold a position of trust. It is imperative that these are not abused in any way. April Well Limited staff and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers should be aware of their own conduct and ensure that their professional practice is clear and unambiguous. Staff should ensure that they work in an open and transparent way, not showing favouritism and by treating students respectfully and fairly irrespective of culture, disability, gender, language, racial origin, religious belief and sexual orientation.

Duty of care to children and young people

All staff and volunteers have a duty of care to children and young people. As such they must adhere to the various policies, including the safeguarding and child protection policy that outline how we safeguard students in our care.

Exercising professional judgement

April Well Limited recognises that this guidance may not cover every eventuality. There may be times when staff use their professional judgement to deal with situations not outlined in this section. In such circumstances staff should always advise their senior colleagues of the justification for any action taken or proposed.

Use of appropriate language

It is important to remember that whilst undertaking your role, you are representing April Well Limited. We expect all staff and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers to be polite and courteous whilst undertaking their duties. It is inappropriate to swear or use abusive language.

Sexual contact with young people

Any (contact or non-contact activity) sexual behaviour (including grooming of a child so sexual abuse can take place), by a member of staff or homestay with or towards a student is unacceptable and could be a matter for criminal and/or disciplinary proceedings. Students are protected by the same laws as adults in relation to non-consensual sexual behaviour, and by additional legal provisions depending on their age and understanding.

Communication with Students

Communication with students should only be in a professional capacity, using appropriate language and tone. Any communication, for example via telephone or WeChat should be via a guardianship organisation device. Immediate safeguarding action must not be delayed; report and record any unavoidable emergency departure from approved communication arrangements.

Social contact with Students

Staff members should not give their personal contact details to students for example email address, home or mobile telephone numbers or details of web-based identities. If students locate these by any other means and attempt to contact or correspond with the staff member, the staff member must report the contact to their line manager and must not continue a social exchange. Any urgent request for help or safeguarding disclosure must be acted on immediately. Students and staff should communicate for professional reasons using the company email addresses and telephone numbers. It is inappropriate for staff to befriend students and mix with them socially as a friend.

Social contact with Parents / Agents / Staff at partner schools

As for students, it is inappropriate for guardianship organisation staff (and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers) to befriend parents, agents or school staff on social media (unless they were previously friends). April Well Limited expects any contact that staff or homestays have with parents, agents and staff at partner schools to be courteous and polite as the individual is representing the organisation. It is inappropriate for staff (and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers) to befriend parents, agents or staff at partner schools and mix with them socially as a friend unless of course they were previously friends before working with them.

Physical contact

Guardianship organisation staff are advised to avoid physical contact with students as even when well intentioned, this contact may be misconstrued by the student, an observer or any person to whom this action is described. There may also be cultural, gender sensitive or religious reasons about

touching which the homestay member is not aware of. Guardianship organisation staff must be aware that any physical contact with a student may need to be explained and would be open to scrutiny. Homestays and staff may only use reasonable, appropriate and lawful means of control to maintain safety.

An outright ban on any corporal punishment

It is illegal to use corporal (physical) punishment. Any reported incidences of corporal punishment will be reported by April Well Limited to the police.

Care of distressed Students

When a student is upset or distressed (for example due to homesickness) remember that sympathy and help can be given using kind words. Also, sitting with the student and listening to them until they feel better can also be of great comfort. Staff should, therefore, use their professional judgement at all times and in cases where this may be unavoidable (for example a young child who has fallen over, makes physical contact with the primary carer first, or is crying with homesickness), we would recommend asking a child if physical comfort is wanted before giving it. However, in the majority of cases it would not be appropriate, and we do not recommend physical contact. We would encourage comforting the child as detailed above.

One-to-one meetings

Members of staff and homestays should be mindful when meeting students on a one-to-one basis. Staff meeting students should do so in a public space, such as a school classroom, meeting room or common room. If meeting students outside of school the meetings should take place in a public area such as a coffee shop. In the homestay environment, homestays and their families should avoid going into the student's bedroom or inviting them into their bedroom.

Students' entitlement to privacy

Guardianship organisation staff and homestays must respect student's right to privacy. That means not entering their bedrooms (except for urgent safeguarding action, or cleaning with prior warning when the student is not in the room), ensuring that bathrooms have suitable locks and respecting the student's right to retreat to their rooms or a quiet area in the home if they feel the need. When students wish to email or call home, they should be allowed to do so in privacy. Announce emergency entry where possible and record and report the reasons and action taken to the DSL.

Transporting Students

From time to time April Well Limited staff may accompany students when travelling to meetings, school visits or other agreed appointments. Wherever possible, transport will be arranged and provided by the school, parents, or a reputable transport provider.

If a member of staff transports a student in their own vehicle, they must ensure that:

- the journey has been approved in advance by the Director / DSL;
- the driver holds a valid licence and the vehicle meets all legal requirements (for example MOT, tax and insurance covering the intended student transport and any required business use);

- students travel in the back of the vehicle and use seatbelts or appropriate child restraints as legally required (normally a child seat until age 12 or 135cm tall, whichever comes first); and
- a log of the journey is recorded (including date, time, route and the reason for the journey). Required parental travel permission must be recorded. Where a local licensed taxi firm is used, obtain written confirmation of suitable driver checks, including enhanced DBS/PVG checks (AEGIS 4.2–4.3).

April Well Limited does not provide routine or long-term homestay accommodation. However, where April Well Limited uses or approves any homestay, emergency accommodation adult, approved accommodation arrangement, transfer provider or other third party contractor to transport students in connection with emergency support or agreed welfare arrangements, they must follow April Well Limited's transport guidance, safeguarding procedures and any written instructions provided by the Director / DSL.

Gifts and rewards

April Well Limited staff and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers should not give gifts of any significant value. Similarly, such gifts should not be given to the families of students as this could be interpreted as a gesture to groom or bribe a student. Where a reward is given to a student, this should be in accordance with agreed practice, consistent with the behaviour policy and not based on favouritism. On no account should any monetary gifts be given.

There may be occasions where students or their families may want to present you with a gift, for example as a thank you. You can accept gifts (not monetary) and hospitality, which are small gestures and are of low value. Any gift or hospitality which is more than just a token, defined as having a large value should be politely refused or returned.

Use of photographs and videos

Staff should ensure that any photography, videos or images of students are taken with their and their parent's consent and that these are only published where such consent has been obtained. Images should be securely stored and used only by those authorised to do so. Under no circumstances should images be taken of students without consent or without the students knowing that the images are being taken. Staff and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers should always be able to justify images of students in their possession and avoid taking images in one to one situations.

Searching Students and their belongings

Concerns about prohibited or dangerous items must be reported to the DSL. School statutory search powers do not apply to April Well Limited staff or homestays in their guardianship roles. Examples of items giving rise to concern include:

- knives or weapons;
- alcohol;
- illegal drugs;

- stolen items;
- tobacco and cigarette papers;
- fireworks;
- pornographic images;
- any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence or injure a person or damage property.

Contact the DSL before any check of belongings, unless this would delay urgent protection. A student may be asked to show belongings only with informed, freely given agreement. Do not force a search or treat refusal as consent; seek help from the school's authorised staff or police where appropriate. For immediate danger call 999 and take only lawful, necessary and proportionate protective action.

Any agreed belongings check must be sensitive, witnessed and with the student present; use a same-sex adult where practicable. Staff and homestays must not physically search students, require clothing to be removed or compel device access. Do not view, copy or delete suspected child sexual imagery during a belongings check; refer it to the DSL under the Online Safety Policy, including its safeguards for exceptional DSL viewing. Follow police advice. Record the reason, agreement, actions and outcome. Inform parents unless doing so could increase risk or prejudice an investigation; seek safeguarding agency advice where necessary.

Allegations against a member of staff or homestay

Where it is alleged that anyone working, volunteering or hosting students for April Well Limited has:

• behaved in a way that has harmed a child, or may have harmed a child; and/or

• possibly committed a criminal offence against or related to a child; and/or

• behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or

• behaved or may have behaved in a way that indicates they may not be suitable to work with children (known as transferable risk)

April Well Limited will deal with allegations in accordance with the procedure set out in the Safeguarding and Child Protection Policy. Report concerns immediately to the DSL. If unavailable, use vetted cover under the Emergency Procedure or contact the relevant children's social care/MASH directly (Southwark: 020 7525 1921; out of hours 020 7525 5000). Allegations meeting the harm threshold must also be referred promptly to the LADO. If the allegation involves the DSL/Director, contact the LADO directly (Southwark: 020 7525 3297 / 020 7525 0689). Follow LADO advice before investigating. Use the relevant local authority's contacts elsewhere. Call 999 for immediate danger. Submit the written record promptly, no later than 24 hours; do not delay reporting or protection while preparing it.

Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold set out in our safeguarding policy. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working for or on behalf of the guardianship organisation may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. If there is doubt whether the harm threshold is met, consult the LADO promptly.

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. April Well Limited has a Low-Level Concerns policy that outlines the processes followed in the event of a concern being identified.

Self-Reporting

April Well Limited expects that all staff and, where applicable, any homestays, emergency accommodation adults or approved accommodation/transport providers will self-report to our DSL any situation which could appear compromising or be misconstrued, or where their behaviour has fallen below the standards required in this code of conduct.

Whistleblowing

The April Well Limited Whistleblowing Policy provides guidance to staff on how to deal with malpractice in the workplace where there is concern for the safety of children.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 23/10/2026

Signed: 

Name: Xiaoying Chi

Role: Director and Designated Safeguarding Lead (DSL)

Date: 23/10/2026