

Staff Code of Conduct

More Than Ed | Independent School

Date: September 2026

Review Date: September 2027

Responsible Person: Charlotte Holmes/Hayley Winstanley

Document control

Item	Detail
Document title	Staff Code of Conduct
Version date	September 2026
Review date	September 2027
Owner	Managing Director
Responsible person	Charlotte Holmes/Hayley Winstanley
Supersedes	Code of Conduct, September 2025
Signed copy held	Personnel file
Published	Internal – issued to all staff at induction and on each revision

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1. Purpose and Scope

1.1 Purpose

This code sets out the professional standards and behaviours expected of everyone who works at More Than Ed Independent School. Its purpose is to ensure that:

- the safeguarding and welfare of students remains paramount;
- our relational, therapeutic environment is protected and sustained;
- professional boundaries are clearly understood and consistently maintained;
- staff are protected by clear expectations, in a setting where almost all teaching is one to one; and
- the school meets its obligations under the independent school standards and wider law.

1.2 Who this code applies to

This code applies to:

- all teaching and support staff, including senior leaders and the proprietor;
- the in-house psychotherapist, speech and language therapist and any other clinician working at the school;
- volunteers and work experience placements;
- contractors, consultants and visiting professionals who work with or alongside students; and
- all interactions with students, whether at school, off site, during collection and drop-off, or through digital communication.

The school does not use supply staff. Where any individual is engaged who is not covered by the arrangements above, the Headteacher must confirm in advance how this code applies to them.

1.3 Status of this code

This code forms part of the reasonable instructions with which staff are required to comply. It is not a contract of employment and may be amended. Every member of staff signs the declaration at Appendix A at induction and on each revision, and the signed copy is retained on the personnel file. A failure to follow this code may be treated as a disciplinary matter under section 11.

2. Legal and Regulatory Framework

This code should be read in conjunction with:

- Keeping Children Safe in Education (Department for Education), in force 1 September 2026;
- Working Together to Safeguard Children (Department for Education, March 2026);
- the Education (Independent School Standards) Regulations 2014, in particular Part 3 (welfare, health and safety) and Part 4 (suitability of staff);

- the Children Act 1989 and Children Act 2004;
- the Safeguarding Vulnerable Groups Act 2006, including the duty to refer to the Disclosure and Barring Service under section 35;
- section 128 of the Education and Skills Act 2008 and sections 141B to 141C of the Education Act 2002, which provide for directions and prohibition orders barring individuals from management or teaching;
- the Education and Inspections Act 2006, section 93 (power to use reasonable force) and section 93A (recording use of force);
- the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025, in force 1 April 2026;
- the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025;
- the Equality Act 2010;
- the Health and Safety at Work etc. Act 1974;
- the Public Interest Disclosure Act 1998;
- the Teachers' Standards, where applicable to the role;
- the Special Educational Needs and Disability Code of Practice: 0 to 25 years (2015); and
- the school's Safeguarding and Child Protection Policy.

The Children's Wellbeing and Schools Act 2026 received Royal Assent on 29 April 2026. Its provisions are being commenced in stages and include changes to the regulation of independent educational institutions, a more unified framework for handling teacher misconduct, and a forthcoming requirement for schools to have a policy on the use and possession of mobile phones during the school day. This code will be updated as each provision takes effect.

3. Our Model and What It Means for Conduct

More Than Ed is a specialist SEMH day school. Every student has an Education, Health and Care Plan, a substantial majority are looked-after, adopted, subject to a special guardianship order or subject to a child protection plan, and teaching is delivered one to one, in the student's own room, for the whole school day.

That model shapes this code, and staff must understand why. In most schools one-to-one working is an occasional situation to be risk-managed. Here it is the normal way we teach. The safeguards in section 4 are therefore built around one-to-one work as the routine condition, rather than treating it as an exception.

Three features of our practice carry particular weight for conduct:

- We are relational and therapeutic. Our approach is grounded in PACE, Dyadic Developmental Practice and the Trauma Recovery Model, and every member of staff is trauma-informed trained. We work with high warmth and high structure. We do not use punishments, we do not use rewards, and we do not use physical holds.

- Our building is deliberately open. There are no locked doors and no high fences. Staff are not shut in a room with a student all day, and there is a great deal of movement and interaction. Openness is a safeguard, and staff must not undermine it.
- Information is shared flatly and deliberately. All staff have full access to every student's records, so that the person teaching a student knows as much as a senior leader does. This is a strength, and it carries a corresponding responsibility, set out at section 5.4.

The school also protects staff by design: each student has a core team of four staff so that no one is repeatedly with a student in crisis, the next day's timetable is published by 5pm each day, senior leaders handle difficult conversations with parents and carers, all staff wear the same uniform, and senior leaders are available at any time and expect to be called at the first sign of dysregulation. Using those arrangements is part of following this code, not a sign of not coping.

4. Professional Boundaries and Relationships

4.1 Fundamental principles

Warmth is central to our practice, and it is not in tension with professional boundaries. Staff must:

- build relationships based on trust, consistency and respect, while remaining clear that the relationship is a professional one;
- recognise the inherent power imbalance between an adult and a student, which is heightened where a student depends on one adult for the whole school day;
- understand that students with SEMH needs and histories of trauma may be particularly vulnerable to boundary violations, and may test or seek to redraw boundaries;
- understand that a student may misread warmth, humour or physical proximity, and that the responsibility for holding the boundary always rests with the adult;
- never use their position for personal gain, or to pursue any personal or romantic interest;
- never seek to become a student's primary attachment figure or to position themselves as a substitute parent; and
- raise it with a senior leader where a student's attachment to them is becoming a concern, rather than managing it alone.

4.2 Physical contact and personal care

Some physical contact is appropriate and necessary. Where it occurs, staff must:

- keep contact to the minimum necessary for learning, care, comfort or safety;
- explain what they are doing and why, in a way the student understands, and seek their agreement;
- maintain the student's dignity and privacy at all times;
- work with a colleague present when providing intimate care, and record it;

- be alert to individual, cultural and sensory sensitivities about touch; and
- record any contact that was unusual, that the student found difficult, or that could be misread.

Staff must never:

- use physical contact as a punishment, or to assert authority;
- engage in rough play, tickling, cuddling or lap-sitting;
- hold hands other than for safety or mobility support recorded in a student's plan; or
- initiate contact that could be misinterpreted, or that they would be uncomfortable describing to a colleague or to a student's parent.

4.3 Physical intervention, restraint and seclusion

The school does not use physical restraint, physical holds or seclusion as a way of managing behaviour. Our response to dysregulation is relational and de-escalatory, and staff are expected to call on senior leaders at the earliest point rather than allowing a situation to escalate.

The statutory power under section 93 of the Education and Inspections Act 2006 to use reasonable force to prevent a student causing injury, committing an offence or damaging property nonetheless exists and cannot be signed away. If force is ever used, it must be the last resort, the minimum necessary, and for the shortest possible time.

Since 1 April 2026, paragraphs 16A and 32A of the independent school standards require that:

- every use of force is recorded in writing as soon as practicable;
- every incident in which a member of staff secludes, restrains or immobilises a student is recorded in writing as soon as practicable; and
- information about each such incident is provided to the student's parents as soon as practicable, unless doing so would be likely to result in significant harm to the student, in which case the Designated Safeguarding Lead determines the correct route.

Staff must understand that the statutory definitions are wider than they may assume.

Seclusion includes detaining a student away from others by obstructing their way, securing the space, or causing the student to believe they will be punished if they leave. Restraint includes holding any part of a student's body, securing them to an object, or depriving them of an aid they normally use to move.

It follows that some things that may feel like ordinary practice fall within these definitions and must be recorded. Standing in a doorway, telling a student they must stay in a room, or taking away a mobility aid all require a written record and a report to the Designated Safeguarding Lead the same day. If in doubt, record it and report it.

4.4 One-to-one teaching

Because one-to-one teaching is our normal model, the protective arrangements are built into the school day rather than left to individual judgement. Staff must:

- work to the published timetable, and not swap, extend or rearrange sessions without senior leadership agreement;
- keep doors unlocked at all times, and never secure a room from the inside;
- work with reasonable visibility, using the openness of the building rather than working against it;
- record their work with the student on the school's systems the same day;
- take breaks and lunch with the student as timetabled, and not create unstructured or unrecorded time;
- call a senior leader at the first sign of dysregulation, and accept a change of face where one is offered;
- follow the student's plan and any individual risk assessment; and
- report immediately any disclosure, any incident, and any interaction they are uncertain about.

Where a student will only work with certain staff in certain ways, the school will accommodate that, because the student's needs take priority over staffing flexibility. Staff in that position must be especially alert to over-dependence, must not encourage exclusivity, and must raise it with a senior leader.

4.5 Communication and social contact

- all communication with students and families must be professional, and must go through school systems and school accounts;
- staff must never share personal contact details with a student or use a personal telephone, email or messaging account to communicate with one;
- staff must maintain professional language at all times, including when a student is dysregulated or abusive;
- senior leaders handle difficult conversations with parents and carers, and complex or contested matters must be passed to them rather than managed alone; and
- staff must not meet a student or a student's family socially, and must declare any pre-existing or developing personal connection to the Headteacher.

4.6 Social media and digital boundaries

- never accept or send friend or follow requests to or from students, or recent former students;
- do not accept requests from parents or carers unless there is a pre-existing personal relationship that has been declared to the Headteacher;
- keep personal accounts private, and review privacy settings regularly;
- never post images of, or information about, students, families or colleagues;
- do not discuss work, students, families or colleagues on social media, including in closed groups;
- report any attempted contact from a student or family immediately; and

- be aware that students and families may search for staff online, and take that into account in what is publicly visible.

4.7 Photography and images

- use only school-authorised devices to photograph or record students;
- never store images of students on a personal device, and never retain them after upload;
- never share images outside official school channels;
- confirm that consent is in place, current, and covers the intended use before taking or using any image; and
- follow the school's policy on photography, images and social media, and the Website Compliance Policy where an image may be published.

Consent alone is not a sufficient test at this school. Because so many of our students are looked-after, adopted, on a special guardianship order or on a child protection plan, the Designated Safeguarding Lead must confirm before publication that the person consenting holds the authority to do so and that publication carries no risk of a student being located or identified.

4.8 Gifts, favouritism and equal regard

The school does not use rewards as a behaviour approach, so this section is about even-handedness rather than the administration of rewards. Staff must:

- not give personal gifts to individual students;
- not accept significant gifts from students or families, and record any small token such as a card or drawing;
- not single out a student for special attention, access or privileges;
- avoid having favourites, or appearing to; and
- treat every student with equal regard, while responding to their individual needs.

4.9 Home visits

- undertake home visits only as authorised school business, recorded in advance;
- attend in pairs wherever possible, and never alone where a risk assessment indicates otherwise;
- carry identification and a charged mobile telephone;
- never enter a home where only a student is present; and
- log the visit on the school's systems on the same day, and report any concern immediately.

4.10 Daily collection, drop-off and transport

The school's own staff collect and drop off every student each day. This is a deliberate part of our model: it supports transition into and out of the school day and gives daily face-to-face contact with parents and carers. It is core practice rather than an exception, and it carries specific obligations. Staff must:

- drive only where authorised, on the published rota, with a valid licence and business use insurance confirmed by the school;
- follow the agreed route and stops, and never add, omit or alter a stop without authorisation;
- never offer or provide a lift to a student outside these arrangements;
- seat students appropriately and in accordance with any individual plan;
- record every journey on the school's systems;
- use the contact with parents and carers professionally, passing anything of substance to a senior leader rather than discussing it at the door; and
- report any concern arising at the home or during the journey to the Designated Safeguarding Lead the same day.

Route, timing, vehicle and rota information is confidential. It must never be shared outside the school, discussed in public, or published anywhere, including on social media. For students placed away from a person who may pose a risk to them, this information could be used to locate them.

5. Safeguarding and Child Protection

5.1 Responsibilities of all staff

Safeguarding is everyone's responsibility. All staff must:

- read and follow Part 1 of Keeping Children Safe in Education and the school's Safeguarding and Child Protection Policy;
- report any concern about a student's welfare immediately, however small it seems;
- maintain a mindset that it could happen here;
- challenge concerning behaviour by a colleague, and report it under section 10;
- complete safeguarding training and updates as required; and
- never promise confidentiality to a student.

5.2 Recognising vulnerability

Our students face heightened risk. Staff must be alert that a student may:

- be at increased risk of abuse, neglect and exploitation;
- face communication barriers that make disclosure harder;
- not recognise inappropriate behaviour as such;
- be more vulnerable to peer-on-peer abuse and to online harm;
- present behaviour that masks abuse, including behaviour that is easy to read as defiance; and
- be affected by domestic abuse. Where the police believe a student may be a victim of domestic abuse they must notify the school under Operation Encompass, and such a notification does not replace a safeguarding referral.

Professional curiosity is expected. Staff must ask themselves what a behaviour is communicating, and must not accept a convenient explanation without testing it.

5.3 Reporting concerns

- report all concerns to the Designated Safeguarding Lead immediately, and do not wait for the end of the day or the end of a session;
- record concerns accurately, factually and in the student's own words where possible, on the school's systems;
- never investigate a concern independently, and never question a student in a way that could compromise a later investigation;
- follow up if action does not appear to have been taken, and escalate to the Headteacher if still unresolved; and
- use section 10 where the concern is about the conduct of a member of staff.

Any member of staff may make a referral directly to children's social care or the police if they believe a student is at immediate risk and the usual route is unavailable. Nothing in this code prevents that.

5.4 Information sharing

All staff have full access to every student's records. This is deliberate, and it exists so that the adult with a student all day is as well informed as a senior leader. It is not a licence to browse.

- access records because your role requires it, and not out of curiosity. Unnecessary access is a data protection breach and a disciplinary matter;
- share information internally where doing so protects a student. Working Together to Safeguard Children is explicit that hesitation over sharing information causes harm;
- share externally only through the Designated Safeguarding Lead, or where there is an immediate risk;
- never discuss a student outside school, including with your own family; and
- never discuss one student or family with another.

6. Professional Standards and Behaviour

6.1 General conduct

- maintain high standards of honesty, integrity and professionalism, at work and where conduct outside work could affect suitability to work with children;
- treat every member of the school community with respect;
- model the regulation and relational behaviour we expect students to develop;
- challenge discrimination, bullying and harassment;
- declare any conflict of interest, including any financial, personal or family interest;
- not attend work under the influence of alcohol or drugs, and disclose any prescribed medication that could affect capacity to work safely; and

- comply with the duty to disclose changes in personal circumstances at section 10.4.

6.2 Trauma-informed practice

- use trauma-informed language and approaches consistent with PACE, Dyadic Developmental Practice and the Trauma Recovery Model;
- understand behaviour as communication, and respond to the need behind it;
- remain calm and regulated, and seek a change of face when you cannot;
- de-escalate rather than confront;
- never use punitive, shaming, sarcastic or humiliating approaches, and never withdraw warmth as a sanction;
- recognise and respond to sensory needs; and
- provide predictability, and prepare students for change wherever possible.

6.3 Communication standards

With students: adapt communication to the student's developmental level and preferred methods, give clear and consistent messages, never use humiliation or confrontation, and avoid language that shames.

With parents and carers: communicate through official channels, be honest while holding boundaries, never discuss another student or family, and refer complex or contested matters to a senior leader. Our wrap-around model means intensive contact with families, and staff must be clear about the limits of their own role within it.

With colleagues and partner agencies: share information appropriately, support one another, challenge unprofessional behaviour, participate in supervision, and respect other professional perspectives. Near-daily multi-agency work means staff represent the school to others, and must do so professionally.

6.4 Attendance and punctuality

- arrive in sufficient time to prepare, and be ready when a student arrives;
- notify absence as early as possible, so that the day can be re-timetabled around the student;
- attend required training and meetings; and
- understand that continuity matters more here than in most settings, because a student's day is built around a small core team.

6.5 Dress and appearance

- wear the uniform provided. All staff wear the same uniform, so that there is no visible hierarchy;
- dress in a way that is practical for active and physical work, and that maintains dignity;
- avoid jewellery that could cause injury or be grabbed;
- consider sensory sensitivities, including strong fragrance; and

- maintain good personal hygiene.

7. Technology, Data and Artificial Intelligence

7.1 Data protection and confidentiality

- handle personal data in accordance with the UK GDPR, the Data Protection Act 2018 and the school's Data Protection Policy;
- access only the information your role requires;
- keep screens out of view of unauthorised people, and lock devices when leaving them;
- use only school-provided or school-approved encrypted devices for any work away from school;
- never remove paper records from school without authorisation; and
- report any actual or suspected personal data breach immediately, so that the school can meet its 72-hour reporting duty.

7.2 Electronic communications

- use school email and school systems for all school business, and never a personal account;
- maintain a professional tone in all written communication, on the assumption that it may be disclosed in a subject access request or to an inspector;
- never share passwords or login credentials, and use multi-factor authentication where offered;
- respond within reasonable timeframes during working hours, and not feel obliged to respond outside them; and
- follow the school's Information Security and Acceptable Use Policy.

7.3 Mobile phones and personal devices

- do not use a personal device to photograph, record or contact a student;
- do not access social media during contact time;
- keep personal devices password protected, and out of sight during sessions; and
- follow the school's arrangements for student mobile telephones, which will be updated when the statutory guidance under the Children's Wellbeing and Schools Act 2026 is published.

7.4 Artificial intelligence

The school permits the use of approved artificial intelligence tools for professional work, under its AI Policy. Staff must:

- use only tools approved under the AI Policy, and only for the purposes it permits;
- never enter student personal data, safeguarding information, records, or staff personal data into any tool that has not been approved for that purpose;

- never use an AI tool to draft a safeguarding record, an incident record or a referral from personal data;
- check any AI output for accuracy before relying on it or sending it, and remain personally accountable for anything produced with its assistance;
- not use AI to make, or to appear to make, a decision about a student, a family or a colleague; and
- disclose the use of AI where it has materially shaped a document that others will rely on.

8. Health, Safety and Wellbeing

8.1 Health and safety responsibilities

- follow the Health and Safety Policy and all associated procedures;
- complete and follow risk assessments, including individual student risk assessments;
- report hazards, accidents and near misses immediately;
- use personal protective equipment where a plan or assessment specifies it;
- participate in health and safety training; and
- know the emergency procedures, including fire evacuation, lockdown, medical emergency and the response to a student in crisis. Staff must be familiar with these procedures but must not discuss or share their detail outside the school.

8.2 Medication and medical needs

- administer medication only in accordance with a written protocol and after appropriate training;
- never give non-prescribed medication;
- record every administration accurately and at the time;
- store medication securely;
- follow individual healthcare plans precisely; and
- report any error or near miss immediately, without fear of blame.

8.3 Staff wellbeing and supervision

This work is demanding, and the school treats staff wellbeing as an operational matter rather than an initiative. Staff have access to a 24-hour wellbeing service that also covers family members living with them, to supervision on request, to a day off following a major incident involving their student, and to senior leaders at any time.

Staff are expected to:

- use these arrangements, and treat doing so as professional practice rather than weakness;
- seek support and supervision before reaching crisis;
- report concerns about workload, stress or the effect of a particular student on them;

- participate in team support and debriefing after difficult incidents;
- take breaks and leave as timetabled, and not take work home, since the school is designed so that this is unnecessary; and
- look out for colleagues, and raise a concern about a colleague's wellbeing with a senior leader.

9. Equality, Diversity and Inclusion

All staff must:

- comply with the Equality Act 2010 and the school's Equality Policy, and never discriminate against, harass or victimise anyone because of a protected characteristic;
- make and support reasonable adjustments for students, colleagues, parents and visitors;
- challenge discrimination, stereotyping and prejudice, including where it comes from a colleague, a student or a family;
- respect cultural and religious practice, including in personal care;
- adapt communication for students and families with English as an additional language;
- use inclusive language and resources; and
- recognise and challenge racism and disproportionality in safeguarding decisions, consistent with the strengthened expectations in Working Together to Safeguard Children.

10. Allegations, Concerns and Whistleblowing

10.1 Allegations against staff

Where an allegation is made that a member of staff has harmed or may pose a risk to a student, the school will follow Part 4 of Keeping Children Safe in Education and its Allegations Against Staff procedure. This includes referral to the local authority designated officer within one working day where the allegation meets the harm threshold.

- the matter will be handled in accordance with statutory guidance, and not resolved informally where the threshold is met;
- the member of staff has the right to be accompanied or represented;
- support will be provided throughout, including access to the wellbeing service;
- confidentiality will be maintained so far as is possible and lawful;
- a referral will be made to the Disclosure and Barring Service where the statutory duty under section 35 of the Safeguarding Vulnerable Groups Act 2006 applies, and to the Teaching Regulation Agency where relevant; and
- where an allegation is found to be false, unsubstantiated or malicious, it will not be retained on the personnel file and will not be referred to in any reference.

Admissions exclude students with a history of making false allegations, given the one-to-one model. That does not remove the need for every allegation to be taken seriously and handled properly.

10.2 Low-level concerns

A low-level concern is any concern that an adult may have acted in a way that is inconsistent with this code, including behaviour that causes a sense of unease, and that does not meet the harm threshold. The school actively encourages reporting, because patterns only become visible when concerns are shared.

- report all low-level concerns about a colleague to the Designated Safeguarding Lead or the Headteacher;
- self-report where your own conduct may have fallen short, or may be misread. Self-reporting is encouraged and will be responded to supportively;
- expect concerns to be addressed supportively rather than punitively, unless the threshold for an allegation is met;
- understand that records are kept securely so that patterns can be identified; and
- do not decide for yourself that something is too minor to mention.

10.3 Whistleblowing

Staff have a duty to report concerns about safeguarding practice, unprofessional behaviour, unlawful activity, breaches of professional boundaries, and failures to follow policy. Qualifying disclosures are protected under the Public Interest Disclosure Act 1998, and no member of staff will be disadvantaged for raising a concern in good faith.

Concerns should normally be raised in the following order, but a stage may be skipped where it would be inappropriate or ineffective:

- your line manager;
- the Designated Safeguarding Lead or the Headteacher;
- the school's outsourced HR and safeguarding adviser;
- the local authority designated officer, children's social care or the police;
- the NSPCC whistleblowing advice line on 0800 028 0285; and
- the Department for Education, the Independent Schools Inspectorate, the Information Commissioner's Office or another regulator, according to the nature of the concern.

Where the concern is about the Headteacher or proprietor, it should be raised directly with the outsourced HR and safeguarding adviser or with the local authority designated officer.

10.4 Duty to disclose changes in personal circumstances

Staff must inform the Headteacher without delay, and in any event before returning to work with students, of:

- any arrest, police interview under caution, charge, caution, conviction or bail condition, whether or not it relates to children;
- any investigation by children's social care involving their own household;

- anything that would cause them to be disqualified from working with children, and completion of the annual self-declaration when requested;
- any change affecting their right to work in the United Kingdom;
- any health matter that may affect their capacity to work safely with students; and
- any personal or family connection to a student, a student's family, or a prospective member of staff.

Disclosure is not an admission and will not be treated as one. Failure to disclose is itself a serious matter, because it prevents the school from meeting its duties under Part 4 of the independent school standards.

11. Breaches of This Code

A breach of this code may result in:

- management guidance and support;
- additional training or supervision;
- action under the Capability Procedure;
- action under the Disciplinary Procedure, up to and including dismissal;
- referral to the Disclosure and Barring Service;
- referral to the Teaching Regulation Agency;
- a report to the Secretary of State where a direction under section 128 of the Education and Skills Act 2008 may be appropriate; and
- referral to the police.

The following are examples of conduct likely to be treated as gross misconduct:

- any form of abuse or neglect of a student;
- any sexual or romantic conduct towards, or relationship with, a student, including a recent former student;
- a serious breach of professional boundaries;
- inappropriate use of social media;
- failure to report a safeguarding concern, or a disclosure;
- failure to record or report a use of force, restraint or seclusion incident;
- discrimination, harassment or victimisation;
- a serious breach of confidentiality or of data protection, including entering student data into an unapproved AI tool;
- sharing collection, drop-off, route or timetable information outside the school;
- failure to disclose a matter under section 10.4;
- conduct bringing the school into disrepute; and
- criminal conduct affecting suitability to work with children.

12. Support and Training

All new staff receive induction covering this code, safeguarding to the standard the school requires of all staff, and training in our therapeutic model. All staff are trauma-informed trained and hold safeguarding training at the level the school sets for the whole team.

On an ongoing basis the school provides annual updates to this code, regular supervision and access to clinical supervision, professional development, team meetings and peer support, and access to specialist advice including the in-house psychotherapist and speech and language therapist.

13. Related Policies

This code is a summary of expectations. It does not replace the policies below, and staff must read those relevant to their role. The table maps each section of this code to the policies that govern it.

Section of this code	Policies and procedures that apply
1 Purpose and Scope	Staff Handbook; Induction Policy; contracts of employment and volunteer agreements
2 Legal framework	Safeguarding and Child Protection Policy; Safer Recruitment Policy
3 Our model	Behaviour and Relational Policy; Curriculum Policy; SEND Policy; Therapeutic Practice guidance; Safeguarding Companion Guide
4.1 to 4.2 Boundaries and physical contact	Safeguarding and Child Protection Policy; Intimate Care Policy; Supporting Students with Medical Conditions Policy
4.3 Physical intervention, restraint and seclusion	De-escalation and Physical Intervention Policy; Recording and Reporting of Seclusion and Restraint Procedure; Behaviour and Relational Policy; Safeguarding and Child Protection Policy
4.4 One-to-one teaching	Lone Working Policy; individual student risk assessments; Risk Assessment Policy; Timetabling arrangements
4.5 to 4.6 Communication and social media	Social Media Policy; Online Safety Policy; Information Security and Acceptable Use Policy
4.7 Photography and images	Photography, Images and Social Media Policy; Website Compliance Policy; Data Protection Policy
4.8 Gifts and favouritism	Behaviour and Relational Policy; Gifts and Hospitality register
4.9 to 4.10 Home visits and transport	Home Visits Policy; Transport Policy; Lone Working Policy; Educational Visits Policy; Health and Safety Policy
5 Safeguarding	Safeguarding and Child Protection Policy; Safeguarding Companion Guide; Low-Level Concerns Policy; Allegations Against Staff Procedure; Anti-Bullying Policy; Attendance Policy

Section of this code	Policies and procedures that apply
5.4 Information sharing	Data Protection Policy; Records Management and Retention Schedule; Safeguarding and Child Protection Policy
6 Professional standards	Staff Handbook; Appraisal and Supervision Policy; Equality Policy; Dress Code
7.1 to 7.3 Technology and data	Data Protection Policy; Privacy Notice – Staff, Volunteers and Contractors; Privacy Notice – Students, Parents and Carers; Information Security and Acceptable Use Policy; Personal Data Breach Procedure; Records Management and Retention Schedule; Website Compliance Policy
7.4 Artificial intelligence	AI Policy; Data Protection Policy; Information Security and Acceptable Use Policy
8 Health, safety and wellbeing	Health and Safety Policy; First Aid Policy; Risk Assessment Policy; Supporting Students with Medical Conditions Policy; Administration of Medication Procedure; Staff Wellbeing and Supervision Policy; Fire and Emergency procedures
9 Equality and inclusion	Equality Policy; Accessibility Policy and Accessibility Plan; SEND Policy; PSHE and RSHE Policy
10 Allegations and whistleblowing	Allegations Against Staff Procedure; Low-Level Concerns Policy; Whistleblowing Policy; Safer Recruitment Policy; Grievance Procedure
11 Breaches	Disciplinary Procedure; Capability Procedure; Safer Recruitment Policy
12 Support and training	Induction Policy; CPD Policy; Appraisal and Supervision Policy

14. Legislation and Guidance

In drawing up this code, the school has had regard to:

- Keeping Children Safe in Education (Department for Education), in force 1 September 2026
- Working Together to Safeguard Children (Department for Education, March 2026)
- Education (Independent School Standards) Regulations 2014
- Education and Skills Act 2008, including section 128
- Education Act 2002, sections 141B to 141C
- Education and Inspections Act 2006, sections 93 and 93A
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Children Act 1989 and Children Act 2004
- Safeguarding Vulnerable Groups Act 2006, including section 35
- Childcare (Disqualification) Regulations 2018, where applicable

- Domestic Abuse Act 2021, section 49A (Operation Encompass)
- Children's Wellbeing and Schools Act 2026
- UK General Data Protection Regulation, Data Protection Act 2018 and Data (Use and Access) Act 2025
- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Public Interest Disclosure Act 1998
- Teachers' Standards (Department for Education)
- Special Educational Needs and Disability Code of Practice: 0 to 25 years (2015)

Appendix A Declaration and Agreement

To be completed at induction and on each revision of this code. The signed copy is retained on the personnel file.

By signing below, I confirm that:

- I have read and understood the Staff Code of Conduct.
- I agree to work to the standards and expectations it sets out.
- I understand that our model means almost all teaching is one to one, and I understand the specific safeguards that apply.
- I understand that the school does not use punishments, rewards, physical holds or seclusion, and I understand my duty to record and report any use of force, restraint or seclusion.
- I understand my duty to safeguard and promote the welfare of students, and to report all concerns immediately.
- I understand my duty to disclose changes in my personal circumstances under section 10.4.
- I understand the confidentiality of collection, drop-off, route and timetable information.
- I understand the restrictions on the use of artificial intelligence tools.
- I will seek clarification if any part of this code is unclear.
- I will complete all required training.
- I understand the consequences of breaching this code.

Member of staff	
Name	
Role	
Signature	
Date	

On behalf of the school	
Name	
Role	
Signature	
Date	

Version of code signed: September 2026