

# EMPOWERING FUTURES ALTERNATIVE PROVISION

## STAFF CODE OF CONDUCT

**Issue Date:** December 2025

**Next Review:** December 2026

**Approved By:** Director, Empowering Futures Alternative Provision

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## 1. PURPOSE AND SCOPE

This Staff Code of Conduct sets out the standards of professional behaviour expected of all staff working for or on behalf of Empowering Futures Alternative Provision (EFAP).

It applies to:

- Employees (permanent, temporary and part-time)
- Tutors, assessors and trainers
- Volunteers
- Contractors, freelancers and agency staff
- Visitors providing regulated activities
- Staff working on-site, off-site, in community locations or online
- Staff working with **children, young people, and adult learners**

EFAP provides education to vulnerable learners. As such, staff must uphold the highest standards of professionalism, safeguarding practice, integrity and conduct at all times.

This Code works alongside:

- Safeguarding & Child/Adult Protection Policy
- Online Safety Policy
- Cyber Security Policy
- Data Protection Policy
- Behaviour Policy
- Health & Safety Policy
- Safer Recruitment Policy
- Allegations & Low-Level Concerns Policy
- Missing Child Policy
- Medication Policy
- SEND Policy

Failure to comply may result in disciplinary action, referral to the Local Authority Designated Officer (LADO), adult safeguarding teams, Police or awarding bodies.

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## 2. CORE EXPECTATIONS

All staff must:

1. **Prioritise the safety and wellbeing of all learners.**
  2. Maintain professional boundaries at all times.
  3. Treat learners with dignity, respect and fairness.
  4. Promote inclusion, equality and anti-discriminatory practice.
  5. Follow all safeguarding procedures, reporting concerns immediately.
  6. Use EFAP-approved communication methods only.
  7. Adhere to online safety, cyber security and data protection standards.
  8. Model positive behaviour and professionalism.
  9. Maintain honesty, integrity and transparency in all actions.
  10. Protect the reputation of EFAP and uphold its values.
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## 3. SAFEGUARDING & DUTY OF CARE

All staff must:

- Understand their duties under **KCSIE 2024/25**, Working Together 2023 and the Care Act 2014.
- Report ANY safeguarding concern immediately to the DSL or Deputy DSL.
- Never promise confidentiality to learners.
- Act in a trauma-informed and emotionally safe manner.
- Escalate concerns regarding adult learners to adult safeguarding pathways.
- Follow the Missing Child Policy during any unexplained absence.
- Follow safer working practices as outlined in safer recruitment guidance.

Staff must NOT:

- Engage in sexualised, suggestive, or inappropriate behaviour.
  - Use intimidating, aggressive or humiliating language.
  - Remain alone with learners in unsupervised or unobserved spaces unless risk assessed.
  - Meet learners outside EFAP activities unless authorised and risk assessed.
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## **4. PROFESSIONAL BOUNDARIES**

Staff must maintain clear boundaries, including:

### **Physical Contact**

- Only appropriate, minimal and necessary physical contact is permitted (e.g., first aid, vocational demonstration).
- No hugging, lap-sitting, intimate physical contact or unnecessary touching.
- In vocational settings (beauty/sports): demonstrations must follow strict safety, consent and professional distancing protocols.

### **Emotional Boundaries**

Staff must not:

- Form personal or romantic relationships with learners.
- Involve learners in staff personal matters.
- Share personal problems or emotional dependence on learners.

### **Private Arrangements**

Staff must NOT:

- Give personal services (beauty, nails, fitness coaching) to learners outside EFAP.
  - Accept private bookings or payments from learners or their families.
  - Transport learners in personal vehicles unless authorised and risk assessed.
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## **5. COMMUNICATION & SOCIAL MEDIA**

### **Professional Communication Only**

Staff must:

- Use only EFAP email accounts or approved platforms.
- Keep all communication transparent and recordable.
- Maintain professional language and tone at all times.

## **Prohibited Communication**

Staff must NOT:

- Communicate with learners via personal phones, WhatsApp, Snapchat, Instagram, Facebook etc.
- Add or follow learners on social media.
- Respond to learner messages sent to personal accounts—these must be reported.

## **Online Conduct**

- No staff member may contact learners privately during online lessons.
  - Online sessions must follow the Online Safety Policy: cameras, backgrounds, behaviour, supervision.
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# **6. ONLINE & REMOTE WORKING**

In online sessions, staff must:

- Use only EFAP-approved platforms.
- Keep their camera on where required.
- Maintain a professional environment (background, attire, tone).
- Ensure safeguarding procedures are followed at all times.
- Record attendance and monitor wellbeing.
- Immediately report online distress or concerning behaviours.

Staff must NEVER:

- Teach from a bed, bathroom or inappropriate environment.
  - Allow others to observe lessons unless authorised.
  - Record sessions without permission.
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# **7. DATA PROTECTION & CYBER SECURITY**

Staff must:

- Comply with EFAP's Data Protection and Cyber Security Policies.
- Use strong passwords and keep login details confidential.
- Only store information on EFAP-approved secure systems.
- Report any data breaches immediately.
- Never use personal USBs, cloud accounts or devices to store learner information.

Confidentiality applies to:

- Learner records
  - Personal information
  - Safeguarding documentation
  - Vocational assessment materials
  - Health and medical information
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## **8. PROFESSIONAL APPEARANCE & CONDUCT**

### **Appearance**

Staff must wear:

- Professional, sector-appropriate clothing.
- Closed footwear in vocational or sports areas.
- EFAP ID badges at all times.

### **Conduct**

Staff must:

- Model respectful communication.
  - Promote a safe, calm environment.
  - Arrive punctually and prepared.
  - Avoid inappropriate language, jokes or comments.
  - Declare any relationships with colleagues or potential conflicts of interest.
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## **9. VOCATIONAL PROFESSIONALISM (Beauty, Nails, Hair, Sports, Fitness)**

Staff must:

- Follow all Health & Safety protocols.
- Maintain infection control standards.
- Ensure learners follow PPE procedures.
- Keep tools, chemicals and equipment secure.
- Never perform treatments on learners outside EFAP.
- Avoid physical demonstrations that cross professional boundaries.
- Risk assess any adapted procedures for SEND learners.

Sports tutors must:

- Maintain safe ratios.
  - Conduct warm-up/cool-down routines.
  - Not participate in physical activity in a way that could compromise professional boundaries.
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## **10. GIFTS, REWARDS & FAVOURITISM**

Staff must:

- Avoid giving personal gifts to learners.
  - Avoid accepting expensive or inappropriate gifts.
  - Ensure praise and support are consistent and fair.
  - Report concerns about bribery or undue influence.
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## **11. CONFLICTS OF INTEREST**

Staff must declare:

- Personal relationships with learners or families.
- Staff working with relatives.
- External employment that overlaps with EFAP delivery (e.g., beauty salons, personal training, tutoring).
- Financial or personal interests affecting impartiality.

Appropriate risk assessments and boundaries must be implemented.

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## 12. LOW-LEVEL CONCERNS & ALLEGATIONS

EFAP follows the Allegations & Low-Level Concerns Policy.

### **Staff must:**

- Report ANY behaviour of a colleague that may be inappropriate or unsafe.
- Log low-level concerns with the DSL/Director.

### **Harm Threshold Cases:**

If behaviour meets or may meet the harm threshold, the DSL will notify the LADO.

Examples include:

- Boundary violations
- Inappropriate communication
- Over-familiarity
- Failing to follow safeguarding rules

No staff member under investigation will work unsupervised with learners.

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## 13. HEALTH & SAFETY DUTIES

Staff must:

- Follow risk assessments
  - Maintain safe teaching areas
  - Report hazards immediately
  - Comply with COSHH procedures
  - Supervise vocational practical sessions closely
  - Complete accident and incident documentation
  - Follow the Missing Child and Medication policies
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## 14. WORKING WITH ADULT LEARNERS

Staff must:

- Recognise safeguarding duties to adults at risk
  - Maintain the SAME boundaries as with young people
  - Not form personal, romantic or financial relationships
  - Avoid power imbalance behaviour
  - Follow confidentiality and professionalism at all times
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## **15. WHISTLEBLOWING**

Staff have a duty to report:

- Unsafe practice
- Professional misconduct
- Safeguarding failures
- Criminal behaviour
- Neglect of duty

EFAP protects staff who whistleblow in good faith.

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## **16. BREACHES OF THE CODE**

Breaches may result in:

- Management action
  - Formal disciplinary procedures
  - LADO referral
  - Police involvement
  - Referral to adult safeguarding
  - Reporting to awarding bodies
  - Termination of employment
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## **17. POLICY REVIEW**

This policy is reviewed annually or earlier if:

- Legislation changes
- Safeguarding guidance updates
- LA or Ofsted feedback
- The organisational structure changes



Approved by:

**Rhean White**

Director & Lead DSL

Empowering Futures Alternative Provision