



STAFF CODE OF CONDUCT AND SAFER WORKING PRACTICE

Last Review Date	September 2026
Policy Reviewer	Director – Kane Wilson
Version	V2 24/09/26
Changes since last review	New safeguarding-focused staff behaviour policy for 2026–2027, replacing the staff-facing function of the former governance-style Code of Conduct.
Next Review Date	September 2027

STATUS AND CONTEXT

Children attend The Ark Smallholding Ltd as a commissioned non-school alternative provision. The Ark adopts the relevant safeguarding and safer-working expectations in KCSIE 2026 as an assurance benchmark for commissioning schools, alongside the directly relevant expectations of Working Together 2026, Leeds safeguarding arrangements and the DfE Non-school Alternative Provision Voluntary National Standards.

1. PURPOSE

This policy sets clear standards for the behaviour of adults working with or around children at The Ark. Its purpose is to safeguard children, promote a culture of openness and professional accountability, help adults maintain safe boundaries, and reduce the risk of conduct being misunderstood or escalating into harm.

The Ark is a small outdoor alternative provision where children may take part in animal care, forest-school and practical activities. Safe practice therefore requires professional judgement as well as clear rules. Appropriate warmth, encouragement, physical assistance and one-to-one support are not prohibited; they must be necessary, proportionate, transparent and professionally defensible.

Professional transparency principle

Staff should conduct themselves in a way that they could reasonably explain to a parent/carer, manager, commissioning school or safeguarding professional. Where circumstances require departure from normal safer-working practice for a legitimate reason, the adult should be open about what happened and report or record it where appropriate.

2. SAFEGUARDING RESPONSIBILITY OF ALL ADULTS

- The welfare and best interests of the child are paramount.
- Safeguarding is everyone's responsibility. Concerns must be acted on promptly and must never be ignored because they appear minor.
- Adults must know the identity of The Ark's Designated Safeguarding Lead (DSL) and Deputy DSL and how to contact them.
- Adults must follow the Safeguarding and Child Protection Policy and immediately pass safeguarding concerns to the DSL/Deputy DSL, while taking emergency action themselves where a child is in immediate danger.
- Adults must maintain professional curiosity, listen to children and avoid assumptions based on behaviour, disability, SEND, family circumstances, race, culture, gender, sexuality or other characteristics.
- Adults must challenge racist, discriminatory, sexualised, humiliating or otherwise unsafe practice.

3. EXPECTED PROFESSIONAL BEHAVIOUR

- act honestly, respectfully, calmly and consistently;
- model safe behaviour and appropriate language;
- follow agreed policies, risk assessments, individual pupil information and commissioner instructions;
- maintain reliable supervision and account for pupils in their care;
- avoid conduct that exploits, humiliates, intimidates or creates inappropriate dependency;
- raise mistakes, near misses, boundary concerns and safeguarding doubts openly rather than conceal them;
- co-operate with safeguarding enquiries, supervision, training and lawful management instructions;
- report any personal circumstance that may materially affect their ability or suitability to work safely with children.

4. PROFESSIONAL BOUNDARIES AND RELATIONSHIPS WITH PUPILS

Relationships should be warm, respectful and supportive, but always professional and child-centred. Adults must not use their role to meet their own emotional, social, financial or sexual needs.

- Do not seek or encourage a secret, exclusive or "special" relationship with a pupil.
- Do not show favouritism or give one pupil materially different personal attention without a defensible educational, welfare or safeguarding reason.
- Do not share excessive personal information or invite pupils into the adult's private life.
- Do not use pet names, language or behaviour that is sexualised, possessive, degrading or suggestive of an adult relationship.
- Do not meet pupils socially outside agreed provision arrangements or invite them to a private home unless this forms part of a formally authorised arrangement with appropriate safeguards.
- Do not borrow money from, lend money to, trade with or enter private financial arrangements with pupils or their families.

- Any romantic or sexual relationship with a child is prohibited and may be criminal. Staff must be alert to position-of-trust law and must seek management advice regarding any relationship involving a former pupil where a continuing power imbalance or safeguarding concern may exist.

5. ONE-TO-ONE WORKING AND BEING ALONE WITH A CHILD

One-to-one work may be necessary and beneficial in alternative provision. It is not prohibited. However, unnecessary secrecy or seclusion increases risk for both the child and the adult.

- Where reasonably practicable, another adult should know where the member of staff and pupil are and the nature of the activity.
- Use locations that are accessible, observable or capable of interruption where possible.
- Avoid locking doors or choosing unnecessarily secluded spaces for routine one-to-one work.
- Follow individual risk assessments, support plans and any commissioning-school instructions relevant to supervision.
- If an unexpected situation leaves an adult alone with a child in circumstances that could be misunderstood, the adult should act safely, end unnecessary seclusion and report the circumstances if appropriate.
- A pupil's wish to speak privately should be respected as far as possible without creating unsafe secrecy. Safeguarding disclosures must be passed on in accordance with policy.

6. OUTDOOR, WOODLAND AND FOREST-SCHOOL PRACTICE

The Ark's environment includes practical and outdoor spaces where sight lines, noise, weather, animal enclosures and movement around the site can create different safeguarding risks from a classroom.

- Adults must maintain appropriate awareness of where pupils and colleagues are during activities.
- Do not take a pupil into a secluded woodland, shed, barn, enclosure or other screened area without a legitimate activity or safeguarding reason and appropriate awareness by colleagues.
- Use communication arrangements such as agreed check-ins, radios or work phones where required by the activity or risk assessment.
- Plan for pupils moving between areas, collecting equipment, using toilets or separating temporarily from a group.
- Consider visibility, access, escape routes, animal behaviour, weather and emergency communication as part of supervision decisions.
- If an emergency requires unusual proximity, seclusion or physical intervention, prioritise immediate safety and then record/report the event as required.

7. ANIMAL-CARE AND PRACTICAL ACTIVITIES

Animal care may legitimately require close supervision and, at times, physical guidance. Staff should use the least intrusive form of assistance consistent with safety and learning.

- Explain what assistance is needed and why, in a way the pupil can understand.
- Seek the pupil's cooperation and consent where practicable, recognising that immediate safety may require prompt action.
- Use only the minimum necessary physical contact or intervention.
- Preserve dignity and avoid contact that is unnecessary, prolonged or capable of being interpreted as sexual or punitive.
- Stop the contact when the need has ended.
- Report or record unusual, significant or disputed contact in accordance with relevant policy.

8. PHYSICAL CONTACT AND APPROPRIATE TOUCH

Appropriate touch is not banned. It may be necessary for safety, instruction, first aid, reassurance or to prevent harm. The context, purpose, duration, location of contact, pupil's needs and the adult's role must always be considered.

- Never use sexualised, gratuitous, secretive, intimidating or punitive physical contact.
- Respect verbal and non-verbal indications that a pupil is uncomfortable, unless immediate safety requires intervention.
- Where a pupil seeks physical comfort, respond in an age-appropriate and professionally bounded way.
- First aid and intimate/personal care must follow the relevant policy and care plan where applicable.
- Any physical intervention or restraint must comply with The Ark's Physical Intervention Policy and authorised training.

9. BEHAVIOUR MANAGEMENT, DE-ESCALATION AND RESTRICTIVE INTERVENTION

Staff must use The Ark's agreed positive behaviour approach, de-escalation methods and individual strategies. Restrictive intervention must never be used as punishment or for staff convenience.

- Do not use corporal punishment, humiliating sanctions, degrading treatment, threats of unlawful force or punitive exercise.
- Do not deliberately provoke, taunt, ridicule or shame a pupil.
- Physical intervention is a last resort and must be necessary, proportionate, consistent with policy and within the adult's training and competence.
- Incidents requiring physical intervention must be recorded, communicated and reviewed as required, including any injury, debrief or change to risk/support plans.
- Staff should seek support early if behaviour is escalating beyond their competence or capacity

10. TRANSPORT OF PUPILS

- Pupils must only be transported where the journey has been authorised under The Ark's arrangements or agreed with the commissioner/parent as appropriate.
- The driver must hold the appropriate licence and insurance and the vehicle must be roadworthy, legally compliant and suitable for the pupil.
- Seat belts and any required safety restraints must be used.
- Collection, drop-off and route arrangements should be agreed in advance where practicable; unnecessary detours or personal errands with a pupil are not permitted.

- Risk-assessed seating or additional staffing arrangements should be used where a pupil's needs or behaviour require them.
- Unexpected incidents, delays, changes of destination or safeguarding concerns during transport must be communicated and recorded appropriately.

11. MOBILE PHONES, PERSONAL DEVICES, PHOTOGRAPHS AND RECORDINGS

- Personal phones and devices must not normally be used to photograph or video pupils.
- Pupil contact details, photographs, safeguarding information or other confidential data must not routinely be stored on personal devices.
- Only approved devices, systems and accounts should be used for planned work-related photography, video or recording.
- Images or recordings must have a legitimate authorised purpose and be handled in accordance with consent, safeguarding and data-protection arrangements.
- Covert, humiliating, sexualised, unnecessary or personal-use images/recordings are prohibited.
- If a personal device must be used in a genuine emergency, the use must be necessary and proportionate, reported to management as soon as practicable, and any pupil data transferred/deleted securely in accordance with instructions.

12. ELECTRONIC COMMUNICATION, MESSAGING AND SOCIAL MEDIA

- Use approved organisational communication channels for contact with pupils and families wherever available.
- Do not add, follow or accept current pupils through personal social-media accounts or invite them to do so.
- Do not use disappearing-message or private social-media services for routine communication with pupils.
- Do not engage in private, secretive, sexualised or highly personal messaging with pupils.
- Do not publish information, images or comments that identify a pupil or disclose confidential information without authority.
- If a pupil contacts a personal account unexpectedly, maintain professional boundaries, avoid prolonged private engagement, preserve relevant evidence where safeguarding may be involved, and inform the DSL/manager.
- Conduct on personal social media must not call the adult's suitability to work with children into question or undermine safeguarding confidence.

13. ACCEPTABLE USE OF TECHNOLOGY AND GENERATIVE AI

Technology must be used lawfully, securely and in a way that supports safeguarding. Generative AI may be useful for administrative or educational tasks only where its use is authorised and does not compromise children's information, rights or safety.

- Do not upload pupil-identifiable safeguarding records, EHCP material, health information, contact details, photographs, videos or confidential case information to unauthorised AI services.

- Do not use AI or editing tools to create sexualised, degrading, deceptive or harmful representations of pupils or colleagues.
- Do not rely on AI-generated safeguarding advice instead of The Ark's reporting procedures or qualified professional advice.
- Check material generated by AI before professional use. The staff member remains responsible for accuracy, suitability, bias, confidentiality and copyright/data-protection compliance.
- Follow the Online Safety Policy, Data Protection Policy and any specific organisational AI/technology instructions.

14. CONFIDENTIALITY AND INFORMATION SHARING

- Protect confidential information and access it only where there is a legitimate work need.
- Never promise a child absolute confidentiality about a safeguarding matter.
- Share safeguarding information with the DSL and with relevant agencies/commissioners when necessary and appropriate to protect a child.
- Record concerns factually, distinguishing observation, disclosure and professional opinion.
- Do not discuss pupils, families or colleagues in public places or through unauthorised channels.
- Data protection must not be used as a reason to withhold information where sharing is necessary and lawful for safeguarding.

15. GIFTS, REWARDS, FAVOURITISM AND INFATUATIONS

- Rewards must be consistent with The Ark's agreed practice, proportionate and transparent.
- Do not give secret, intimate, expensive or disproportionate personal gifts to a pupil.
- Significant gifts or hospitality offered by a pupil or family should be declared to management.
- Avoid favouritism and exclusive treatment that cannot be professionally justified.
- If a pupil appears to develop an infatuation, unusually intense attachment or boundary-crossing interest in a member of staff, the adult must not manage it privately. They should maintain boundaries and discuss it promptly with the DSL/manager.

16. LANGUAGE, HUMOUR AND CONVERSATIONS

Friendly humour and informal conversation can support relationships at The Ark, but they must remain appropriate to the adult's professional role and the pupil's age, needs and vulnerability.

- Do not use sexualised jokes, comments about a pupil's body, humiliating nicknames, discriminatory language or threatening/aggressive language directed at a child.
- Do not initiate unnecessarily intrusive conversations about sex, relationships or private matters outside a legitimate educational or safeguarding context.
- Do not use sarcasm or humour to belittle, shame or isolate a pupil.
- Challenge discriminatory, racist, homophobic, transphobic, sexist, ableist or otherwise abusive language appropriately and in line with safeguarding/behaviour procedures.

17. DRESS AND PRESENTATION

Clothing and presentation should be safe, practical for outdoor and animal-care work, hygienic where required, and professionally appropriate around children. Required PPE and activity-specific safety requirements take priority. Clothing, slogans or imagery that are offensive, sexualised, discriminatory or incompatible with safeguarding expectations are not appropriate.

18. ALCOHOL, DRUGS, MEDICATION AND IMPAIRMENT

- No adult may work with or supervise pupils while impaired by alcohol, illegal drugs, misuse of medication or another substance.
- Alcohol or illegal drugs must not be consumed during working time or before work where their effects could impair safe performance.
- A staff member whose prescribed medication or health condition may materially affect safety-critical duties should confidentially inform an appropriate manager so risks can be assessed and managed.
- Concerns that another adult appears impaired while responsible for children must be reported immediately.

19. CONDUCT OUTSIDE WORK AND DUTY TO DISCLOSE RELEVANT CONCERNS

Private life is respected. However, adults working with children occupy positions of trust and must disclose information that may reasonably affect their suitability or ability to work safely with children.

- relevant arrest, charge, conviction or police investigation;
- social-care, LADO or safeguarding involvement concerning their conduct where this may be relevant to the role;
- a restriction, barring, prohibition or professional-disciplinary matter relevant to work with children;
- conduct in personal or online life that may indicate a risk to children or serious incompatibility with the role;
- any circumstance that creates a significant conflict of interest or safeguarding risk.

Disclosure does not automatically mean disciplinary action will follow. The purpose is to allow appropriate, fair and proportionate safeguarding assessment.

20. RELATIONSHIPS AFTER A PUPIL LEAVES THE ARK

Professional boundaries do not automatically end on the pupil's final day. Staff should consider the former pupil's age and vulnerability, the nature of the previous relationship, any continuing position of trust, how contact could be perceived, and whether a power imbalance remains. Any proposed personal relationship or significant ongoing contact that could raise a safeguarding concern should be discussed with management before it develops.

21. VISITORS, CONTRACTORS, VOLUNTEERS AND OTHER ADULTS

- Volunteers, contractors, self-employed practitioners and placement students must receive safeguarding information proportionate to their role and follow the relevant parts of this Code.
- Visitors must comply with site safeguarding arrangements and supervision requirements.
- Staff must not ignore concerning behaviour because the person is not employed by The Ark.
- Concerns about agency staff, contractors or other externally employed adults should also be shared with their employer where appropriate, alongside safeguarding/LADO action.

22. REPORTING CONCERNS ABOUT THE BEHAVIOUR OF AN ADULT

Concerns about adults must be reported through the correct route. Staff should not investigate the matter themselves, confront the adult in a way that could compromise evidence, or agree to keep the concern secret.

Situation	Immediate route	Key point
Safeguarding concern about a child	DSL / Deputy DSL	Act immediately. If a child is in immediate danger, take emergency action including 999 where required.
Adult behaviour that may breach this Code but does not appear to meet the harm threshold	Low-level concern route	Share promptly. "Low-level" does not mean unimportant.
Adult may have harmed a child, committed a relevant offence, pose a risk of harm, or may be unsuitable to work with children	Senior safeguarding manager / LADO route	Do not delay. Leeds LADO should be consulted/notified in accordance with local procedures.
Concern cannot safely be raised internally, or genuine concerns are not being addressed	Whistleblowing route	Use The Ark's Whistleblowing Policy and/or appropriate external channels.

23. LOW-LEVEL CONCERNS

A low-level concern is any concern, however small, that an adult working in or on behalf of The Ark may have acted in a way that is inconsistent with this Code, including relevant conduct outside work, but the information does not appear to meet the harm threshold for an allegation/LADO referral. The term "low-level" describes the threshold, not the importance of reporting the concern.

Examples may include:

- being over-friendly or developing inappropriate familiarity with a pupil;
- having favourites;
- taking photographs of pupils on a personal phone contrary to policy;
- unnecessarily being one-to-one with a child in a secluded area or behind a closed door;
- humiliating a pupil;

- inappropriate private messaging or social-media contact;
- boundary-crossing gifts, language, touch or disclosure of personal information;
- conduct outside work that creates a safeguarding or suitability concern but does not currently appear to meet the harm threshold.

23.1 SHARING AND SELF-REFERRAL

All low-level concerns should be shared promptly with the person designated by The Ark to manage them. Staff are encouraged to self-refer where they have found themselves in a situation that could be misinterpreted, appeared compromising, or where on reflection they believe their conduct fell below expected standards. Self-referral will be treated as a sign of safeguarding openness and considered proportionately.

If the concern relates to the person who would normally receive it, it must be reported to the alternative senior person identified in The Ark's Safeguarding and Child Protection Policy or, where necessary, directly to the LADO/commissioner/whistleblowing route.

23.2 RECORDING AND RESPONSE

- Record the nature of the concern, context, person raising it where known, action taken, decisions, rationale and outcome.
- Respect requests for anonymity as far as reasonably possible, while being clear that absolute anonymity cannot always be guaranteed.
- Store records securely and confidentially in accordance with data-protection requirements.
- Review records for patterns of inappropriate or concerning behaviour.
- Take proportionate action, which may include advice, training, supervision, management instruction, disciplinary action, policy change or escalation to LADO.
- If there is doubt about whether the harm threshold may be met, seek LADO advice.

24. ALLEGATIONS AND HARM-THRESHOLD CONCERNS

Leeds LADO arrangements apply where it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Leeds LADO

Leeds Safeguarding Children Partnership states that the LADO should be informed within one working day of allegations that meet the criteria. Current Leeds LADO contact: 0113 3789687; LADO@leeds.gov.uk. Always check the current LSCP procedure/contact details at the time of an incident.

The Ark will follow the LSCP/West Yorkshire managing allegations procedure, liaise with the commissioning school/local authority as appropriate, and consider police, children's social care, disciplinary, employment and DBS referral requirements. Staff must preserve confidentiality and must not carry out their own investigation.

25. DUTY TO REPORT SUITABILITY CONCERNS AND DBS REFERRAL CONSIDERATIONS

Safeguarding concerns about an adult may reveal information relevant to their continuing suitability to work with children. Staff must report such information to management even where the behaviour did not occur at The Ark. Where The Ark removes a person from regulated activity, or would have removed them had they not resigned or otherwise left, because the relevant statutory referral conditions are met, The Ark will consider and make any required referral to the Disclosure and Barring Service in accordance with law and the Safer Recruitment Policy.

26. WHISTLEBLOWING

All adults should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in The Ark's arrangements. Genuine concerns raised in good faith will be taken seriously and handled appropriately.

- Use The Ark's Whistleblowing Policy where normal management or safeguarding routes are inappropriate, unsafe or have failed to address a genuine concern.
- External routes remain available. KCSIE identifies the NSPCC Whistleblowing Advice Line as an alternative route for child-protection concerns that staff feel unable to raise internally or believe are not being handled properly.
- Current NSPCC Whistleblowing Advice Line: 0800 028 0285; help@nspcc.org.uk. Contact details should be checked before publication/review.

27. BREACHES OF THIS CODE

Breaches will be considered according to their seriousness, context, impact and safeguarding implications. Action may include advice, supervision, training, management instruction, change of duties, disciplinary action, termination of volunteering/contractual arrangements, referral to the LADO, police, children's social care, DBS, a commissioner or other appropriate authority. Safeguarding action is separate from, and may occur alongside, employment or disciplinary processes.

28. INDUCTION, TRAINING, SUPERVISION AND ANNUAL ACKNOWLEDGEMENT

- This policy must be provided at induction to relevant staff and volunteers in a form proportionate to their role.
- Permanent staff should receive safeguarding and child-protection training and updates in accordance with The Ark's safeguarding training arrangements and current DfE/Leeds expectations.
- Professional-boundary issues, low-level concerns and learning from incidents should be addressed through supervision, training and management review where appropriate.
- The policy will be reviewed at least annually and sooner where safeguarding guidance, law, local procedure or the nature of The Ark's provision changes.
- Staff and relevant volunteers should confirm annually that they have read, understood and will follow the current version.