



SENSES Learning Hub

Staff Code of Conduct Policy

Created: 11.09.26

Review date: 11.09.27

Dawn Oughtibridge (Director)

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John Fox (Director)

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This policy sets out clear guidance on the standards of behaviour expected from all staff at SENSES Learning Hub. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

Staff are in a unique position of trust and influence as role models for students, therefore, they must adhere to behaviour that sets a good example to all students within the provision.

Staff also have an individual responsibility to maintain their reputation and the reputation of the provision, both inside and outside working hours and the work setting.

This Code of Conduct should be read alongside SENSES Learning Hub's safeguarding and child protection policy, behaviour policy, social media policy, anti bullying policy, whistleblowing policy, health and safety policies and any other relevant policies and procedures. It is informed by Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, the Alternative Provision statutory guidance, the Data Protection Act 2018, the UK General Data Protection Regulation and other relevant legislation and statutory guidance. The DfE's Alternative Provision statutory guidance applies to independent providers that deliver alternative provision.

Safeguarding is everyone's responsibility. All staff, regardless of their role, must understand that they have a responsibility to safeguard and promote the welfare of children and young people. Staff must act immediately if they have a concern about the safety or welfare of a student and must follow SENSES Learning Hub safeguarding procedures. Staff must never assume that someone else will pass on a concern.

There are certain categories of information which employees must not disclose. Examples include sensitive information which could damage the interests of the provision or its staff or students. Staff should seek guidance from the Directors on the categories of information that cannot be disclosed.

All staff members must avoid using information obtained through their job for personal gain or to be used to the detriment of the provision and/or its employees and/or students, or pass such information on to others who might benefit from it or use it to the detriment of the provision and/or its employees and/or students.

Staff must not access SENSES Learning Hub systems to gain information that is not directly related to their role or required in the course of their work.

Personal Interests

It is important that staff members are protected from accusations of impropriety. Staff should declare in writing to the Directors any financial or non-financial interests which they consider could conflict with the interests of the provision or adversely affect the performance of their duties.

Staff must also declare any situation where a personal relationship, financial interest, outside employment, social media connection or other personal circumstance could reasonably



create a conflict of interest or create the perception of preferential treatment, inappropriate access or compromised professional judgement.

Professional Behaviour and Conduct

Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. SENSES Learning Hub expects staff to treat each other, students, parents and the wider community with dignity and respect at all times.

Staff must act in accordance with their duty of care to students and ensure that the safety and welfare of students are accorded the highest priority.

Staff must have regard for the ethos and values of the provision and must not do or say anything which may bring the provision into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside SENSES Learning Hub and responsibilities within the provision. Staff should act in accordance with the policies and procedures at all times.

Where any element of staff behaviour, impropriety or breach of the policies set out in this document, is causing concern then the individual with the concern should inform the Directors.

Where the concern relates to a Director, the concern should be reported through the safeguarding, whistleblowing or other appropriate external reporting route identified within SENSES Learning Hub's policies. Staff must not feel prevented from raising a safeguarding concern because the concern relates to a senior member of staff.

SENSES Learning Hub will maintain appropriate procedures for dealing with concerns or allegations about staff, including volunteers, contractors and other individuals working with students. These will include concerns which may meet the harm threshold and concerns which do not meet the harm threshold, commonly referred to as low level concerns. A low level concern must not be ignored simply because it does not meet the threshold for a formal safeguarding allegation.

Gifts and Hospitality

Staff members should act with caution when accepting or giving gifts or hospitality and always seek approval from their Directors. All gifts and hospitality received or given must be declared. Any member of staff who corruptly receives gifts will face disciplinary action. However, there may be occasions where students or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year; this will be acceptable as long as such gifts do not contravene any element of this document.

It is unacceptable to accept gifts on a regular basis or to suggest to students that gifts are appropriate or desired. Money must not be accepted as a gift. If a member of staff is unsure whether to accept a gift, they should consult the Directors.



Other than as stated above, staff must not accept gifts or hospitality from students, parents, carers, actual or potential contractors or outside suppliers. All such gifts/offers of hospitality should be reported to their line manager and recorded or offered up to a suitable means of disposal.

Contact with press and media

In the main, the Directors are the only people who should have contact with the press or media. No member of staff should give a view which is contrary to or critical of the provision's policy. Staff members must seek authorisation from the Directors prior to speaking to the media.

Outside working hours, any member of staff is entitled to voice their opinion on issues affecting the local community e.g. at a neighbourhood forum. However, they must avoid any conflict of interest and should not criticise, damage or act in any way against the provision, either verbally, or in making or writing a comment against a published article or a post on social media. Staff members should also be mindful of any potential impact on the provision if they take up or engage in any dispute or complaint with the Council and should avoid such situations where a conflict of interest may occur.

Staff should remember that their freedom to express personal opinions does not remove their professional responsibilities. Staff must not disclose confidential information, identify students or families, share safeguarding information or publish material which could compromise the privacy, safety or welfare of a student or colleague.

Dress and Appearance

SENSES Learning Hub recognises that dress and appearance are matters of personal choice and self expression. However, all staff must dress in a manner that is appropriate to a professional role and that promotes a professional image.

Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.

Staff should dress safely and appropriately for the tasks they undertake.

Smoking, alcohol and other substances

SENSES Learning Hub is a non-smoking site. Staff must not smoke on the premises/garden or immediately outside the building. Any member of staff wishing to smoke must leave the grounds.

Staff must not smoke whilst working with or supervising students offsite.

Staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near the premises.



Staff must ensure that their ability to safely supervise or work with students is not impaired by alcohol, illegal substances or any medication or other substance which may affect their judgement, behaviour, coordination or ability to carry out their duties safely. Where a prescribed medication may affect a staff member's ability to work safely, appropriate advice should be sought.

Relationships with Students

Staff must maintain professional boundaries with students appropriate to their position and must always consider whether their actions are warranted, proportionate, safe, not open to misinterpretation and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.

Staff must not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person seeks to establish social contact, staff should not accept that social contact and be aware that such social contact could be misconstrued.

Staff must not develop personal or sexual relationships with students and should not engage in any sexual activity with a student. Sexual activity does not just involve physical contact including penetrative and non-penetrative acts.

In terms of the safeguarding of children sexual abuse is defined as ... 'forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including via the internet.

Staff must not make sexual remarks to a student, discuss their own sexual relationships with, or in the presence of, students or discuss a student's sexual relationships in an inappropriate setting or context.

Contact with students should only be through the delivery of what would be considered to be normal school activities. Personal phone numbers, email addresses or communication routes via all social media platforms should not be used and staff should not share their home address with students. If contacted via an inappropriate route the member of staff must inform the Directors immediately.

SENSES Learning Hub staff must not accept friend invitations or become friends with any student on any social media platform. Staff should also refrain from following social media accounts of students.

Staff must not use personal messaging applications, personal email accounts, personal social media accounts or personal telephone numbers to communicate privately with current



students. Where communication with a student is necessary, an approved SENSES Learning Hub communication route must be used and the communication must be appropriate, professional and capable of being viewed by the Directors if necessary.

Staff must not use disappearing messages, encrypted personal messaging services or other communication methods designed to prevent appropriate professional oversight when communicating with students.

Staff must not communicate with students through personal gaming accounts or online gaming platforms. Staff must also consider the safeguarding implications of online relationships, gaming communities and social media activity where this could create a professional boundary concern.

Infatuations

It is entirely possible that students or sometimes, their parents, develop infatuations towards members of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.

Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. Any indications of an infatuation towards an individual or another member of staff must be reported to the line manager in the first instance and the Directors as soon as possible.

Staff should record and report any significant or repeated behaviour that could indicate an inappropriate attachment, dependency or boundary concern. Staff should not attempt to manage such situations alone.

Physical contact with students

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with students it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.

Staff should be aware that even well-intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Staff should never touch a child in a way which may be considered indecent. Always be prepared to explain actions and accept that all physical contact be open to scrutiny. Staff must not engage in rough play, tickling or fun fights with students.

Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact and staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.



Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority.

If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to the Directors, recorded and, if appropriate, a copy placed on the child's file.

Child in distress

There may be occasions when a student is in distress and in need of comfort as a reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

Such incidents should always be recorded and shared with the Directors. If a member of staff has a particular concern about the need to provide this type of care and reassurance, they should seek further advice from the Directors.

One to one situation

Staff working individually with students should be aware of the potential vulnerability of students and staff in such situations. Staff should manage these situations with regard to the safety of the student and to themselves.

SENSES Learning Hub recognises that one to one working is a normal and important part of alternative provision. Staff should therefore work transparently and maintain appropriate professional boundaries. Where possible, one to one work should take place in an environment where appropriate visibility and professional oversight can be maintained.

Staff should keep appropriate records of significant one to one interactions where these relate to safeguarding, welfare, behaviour or a concern about a student's wellbeing.

Transporting students

In certain circumstances it may be appropriate for staff to transport students offsite, for example activities off site or outings. A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and to respond to any difficulties that may arise.

Staff will ensure that the transport arrangements and the vehicle meet all legal requirements. Staff will ensure that the driver has the appropriate license for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.

Where staff transport students in a personal vehicle, the journey must be authorised in advance and the staff member must ensure that appropriate business insurance is in place. Transport arrangements should be risk assessed where appropriate and staff must follow



SENSES Learning Hub procedures relating to parental consent, safeguarding and emergency arrangements.

E-Safety

Staff must not engage in inappropriate use of social network sites which may bring themselves or the provision into disrepute.

Staff must not make contact with students, must not accept or initiate friend requests nor follow student's accounts on any social media platform. Staff must not communicate with students via social media, websites, instant messenger accounts or text message.

Staff should not use their personal social media accounts to make contact with students' family members, accept or initiate friend requests or follow students' family member's accounts on any social media platform.

SENSES Learning Hub acknowledges that staff who are also parents may wish to make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with students' family members via social media if that contact is likely to constitute a conflict of interest, be to the detriment of the provision, its staff and/or students or call into question their objectivity.

Staff must not post, share, comment on or otherwise publish information, photographs, videos or other content that identifies a student or could reasonably enable a student to be identified without appropriate authorisation and consent. Staff must not discuss individual students, safeguarding incidents, family circumstances or confidential matters on personal social media accounts.

Staff must also be mindful that content posted outside working hours can affect professional relationships and the reputation of SENSES Learning Hub. Staff should maintain appropriate professional boundaries online and must not engage in online interactions with students that would be inappropriate in person.

Photography, video and images of children

Some of the activities students complete towards their learning or qualifications may involve recording images as part of the units. It is important to take into account the wishes of the student, remembering that some students do not wish to have their photograph taken or be filmed. Consent is asked for from the parents and students at the beginning of the placement.

Using images for publicity purposes will require the age-appropriate consent of the individual concerned and their parent/carer. Images should not be displayed on websites, in publications or in a public place without their consent. Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.



Staff should remain aware of the potential for images of students to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken.

Particular care should be given when filming or photographing young or vulnerable students who may be unable to question how or why the activities are taking place. Staff should also be mindful that students who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.

All photography and video recording of students must be undertaken for an identified educational, safeguarding or authorised publicity purpose. Staff must only use SENSES Learning Hub approved devices and storage arrangements where applicable and must follow the provision's data protection and photography consent procedures. Staff must not use personal mobile phones to photograph or record students unless specifically authorised in accordance with SENSES Learning Hub procedures.

Staff must never take, request, store, send or share intimate or sexualised images of a student. Any concern regarding an image involving a child must be reported immediately in accordance with safeguarding procedures.

Confidentiality

Members of staff may have access to confidential information about students, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the given situation, on a need to know basis.

Staff should never use confidential or personal information about a member of staff, a student or their family for their own, or others' advantage including that of partners, friends, relatives or other

All staff are likely at some point to witness actions which need to be confidential. It must not be discussed outside the provision, including with the student's parent or carer, nor with colleagues, except with a member of staff with the appropriate authority to deal with the matter.

Staff must understand that confidentiality does not override safeguarding responsibilities. Information must be shared with the appropriate person where this is necessary to safeguard a child or prevent harm. Staff must never promise a student that information will be kept secret.

Staff have a responsibility to share information that gives rise to concern about the welfare or safety of a student or that might suggest a student is in need or at risk of harm. Staff should pass on information without delay in accordance with SENSES Learning Hub safeguarding policy and procedures and this should be recorded. Staff must never promise a student that they will not act on or pass on any information that they are told by the student.



SENSES Learning Hub will share information appropriately where this is necessary to safeguard and promote the welfare of a child. Information sharing will be proportionate, lawful and consistent with relevant data protection requirements. Staff should not delay sharing important safeguarding information because they are uncertain about whether consent has been obtained where safeguarding procedures indicate that information should be shared. The Information sharing to safeguard children and young people statutory guidance 2026 applies from September 2026 and should be followed alongside Working Together to Safeguard Children 2026.

If a member of staff is in any doubt about whether to share any information that they possess, they should seek guidance from the Directors.

Any media or legal enquiries should be passed to the Directors.

Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussion.

All staff have a duty to report any behaviour by a colleague which raises concern. Staff should refer to SENSES Learning Hub whistleblowing policy for further guidance. This is particularly important where the welfare of students may be at risk.

Staff should be aware that concerns about colleagues can include concerns that may meet the safeguarding harm threshold and concerns that may not meet that threshold but may nevertheless indicate that professional boundaries are not being maintained. Staff should report concerns promptly rather than attempting to investigate the matter themselves.

SENSES Learning Hub will ensure that staff who raise genuine safeguarding or whistleblowing concerns are treated fairly and are not subjected to detrimental treatment because they have raised a concern in good faith.

Low Level Concerns

A low level concern is any concern, no matter how small, that an adult working with children may have acted in a way that is inconsistent with the expected standards of professional conduct or may not meet the threshold for a safeguarding allegation. Examples could include being over familiar with a student, having inappropriate conversations, using inappropriate language, failing to maintain professional boundaries or other behaviour which causes concern.

A low level concern does not mean that the concern is insignificant. All such concerns should be reported to the Directors and considered in accordance with SENSES Learning Hub safeguarding procedures. Where appropriate, concerns will be recorded and reviewed for patterns or repeated behaviour. This is intended to support a culture of openness, professional challenge and early identification of potential safeguarding risks.

Safeguarding Concerns and Allegations About Staff

Any concern that a member of staff may have harmed a child, may have committed a criminal offence against or related to a child, may pose a risk of harm to children or has otherwise behaved in a way that raises a safeguarding concern must be reported immediately to the Directors and managed in accordance with SENSES Learning Hub safeguarding procedures and relevant local safeguarding arrangements.

Staff must not investigate allegations against colleagues themselves, interview students about allegations or attempt to determine whether an allegation is substantiated. The role of staff is to report the concern promptly and preserve relevant information.

Where a concern relates to a Director, staff must use the alternative reporting route set out in the safeguarding and whistleblowing procedures.

Staff Training and Responsibilities

All staff must read and understand the SENSES Learning Hub safeguarding and child protection policy and this Code of Conduct. Staff must complete safeguarding training appropriate to their role and must remain familiar with current safeguarding procedures. Keeping Children Safe in Education 2026 states that all staff should understand their safeguarding responsibilities and follow their setting's safeguarding policies and procedures.

Staff must contribute to a culture in which safeguarding concerns can be raised openly and without fear. Staff are expected to challenge inappropriate behaviour professionally and report concerns where necessary.

Review Log

Review date	Completed by who
20.08.25	John Fox and Dawn Oughtibridge
11.09.26	John Fox and Dawn Oughtibridge