



BLENHEIM  
SCHOOLS

# Code of Conduct Policy

Policy Folder: Operations



**THIS POLICY APPLIES TO ALL COLLEAGUES WHO WORK WITHIN THE BLENHEIM SCHOOLS DIVISION WHICH IS PART OF OUTCOMES FIRST GROUP.**

### **Code of Conduct Policy**

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**Implementation:** It is the responsibility of line managers to ensure that all colleagues are aware of and understand this policy and any future revisions.

**Our Promise:** WE LISTEN. We never assume. WE WORK TOGETHER. To make the remarkable happen. WE ARE ACCOUNTABLE. To each other and for one another.





## 1.0 INTRODUCTION

1.0 This policy applies to all employees of Outcomes First Group.

1.1 This policy and procedure recognises that the welfare of our young persons, adults and children is paramount and all those working with them must set an appropriate good example.

1.2 This policy must be read by all colleagues, alongside the school's Safeguarding Policy, Low Level concern Policy for schools, Managing Allegations against staff procedures and Whistleblowing Policy which can be found on Engage.

## 2.0 DEFINITIONS

Word / Term	Descriptor
Welfare	The health, happiness, and fortunes of a young person, adult, child or colleague.
Ethical Principles	Individuals must always treat children, young people and adults in our care, fairly and with respect. Language used by individuals should always be appropriate and stated in such a way that the children, young people and adults in our care understand what is being said to them are saying. Individuals must never swear or shout at those we are supporting. Where appropriate individuals should use other forms of communication such as Picture Exchange Communication as set out in individual plans.
Safeguarding Children, Young People & Vulnerable Adults	All colleagues, working with our young persons, adults and children must take all reasonable measures to ensure that the risks of harm to their welfare is minimised. Additionally, where there are concerns about children or vulnerable adults' welfare, all those representing the Group must take appropriate actions to address those concerns.





### **3.0 PURPOSE**

- 3.1 The purpose of this policy is to ensure that any management action taken is fair and consistent and keeping in line with the Groups policies and practices. Therefore, the policy, procedures and processes identified within this document are applied to all colleagues irrespective of age, ethnicity, gender, marital or civil partnership status, nationality, offending history, race, disability, religion or belief, sexual orientation, social status, trade union membership or working patterns.
- 3.2 This policy cannot provide a complete checklist of what is, or is not, appropriate behaviour. It does highlight however, behaviour which is illegal, inappropriate or inadvisable. There will be rare occasions and circumstances in which colleagues have to make decisions or take action in the best interest of a child, young person or vulnerable adult which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the pupils in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.

### **4.0 RESPONSIBILITIES**

- 4.1** Colleagues must care and safeguard for our young persons, adults and children and deliver the OFG promise. Colleagues must complete any mandatory training and/or qualifications required by the group.
- 4.2** Colleagues must promote the welfare of the young persons, adults and children and provide a safe environment for them to live and learn, protecting them from neglect, physical, sexual, and emotional abuse.
- 4.3** Report any concerns regarding our young persons, adults and children as soon as possible to the Designated Safeguarding Lead (DSL) or equivalent. Failure to do so could result in disciplinary action.
- 4.4** All colleagues must ensure they have read, understood and comply with: The OFG Safeguarding Policy and local procedures; *Keeping Children Safe in Education (KCSiE) 2024/2025*, in the case of all school colleagues.
- 4.5** Line managers must ensure they comply with all statutory guidance, minimum standards and legislation relevant to the service.





**4.6** Colleagues must take responsibility for their own health, safety and wellbeing, and contribute to maintaining a safe environment for others. This includes being alert to risks, reporting concerns, and supporting colleagues to work safely.

**4.7** Where colleagues are also parents, they remain responsible for their child(ren) during any event, visit or activity where the child is present. OFG does not accept liability for children of colleagues when the parent is present physically, and parents must ensure their child(ren) are supervised and safeguarded at all times.

## **5.0 STANDARD OF PRACTICE AND ACCOUNTABILITY**

**5.1** Colleagues must always treat our young persons, adults and children fairly and with respect. The language used must always be appropriate and stated in such a way our young people and adults understand. Swearing or shouting will not be permitted at any time.

**5.2** Colleagues' actions in off-duty hours must not compromise the values or the promise of your work with the group.

**5.3** All colleagues have a responsibility to maintain public confidence in their ability to safeguard our young people and adults. All colleagues are expected to conduct themselves in a professional manner whilst at work. This extends to home working, virtual learning or where colleagues are expected to ensure that their working conditions, surroundings and dress code are appropriate for their professional role.

**5.4** Outcome Comes First Group is an alcohol-free business. In line with the Company Expenses Policy, no alcohol will be purchased by Outcomes First Group or expenses payable for alcohol. Colleagues must not consume alcohol during the working day or at any time when they are responsible for young persons, adults or children. At work-related events, a **zero-tolerance approach** applies to the misuse of alcohol. Those choosing to drink outside of this boundary must do so responsibly, at their own expense, and in a way that upholds the highest professional standards. Breaches may result in disciplinary action.

**5.4.1** The Alcohol Policy links directly to the Anti-Bribery and Corruption Policy. Any alcohol given, received or offered as part of gifts or hospitality must be declared on the Gift Register. Failure to disclose may be treated as a disciplinary matter.

**5.5** This document should be read in conjunction with: *Guidance for safer working*





*practice for those working with children and young people in education settings, 2024/2025; Keeping Children Safe in Education (KCSiE) 2024/2025 and any other relevant guidance as instructed.*

**5.6** Colleagues should always consider whether their actions are warranted, proportionate, safe, and applied equitably. Colleagues should work and be seen to work in an open and transparent way.

**5.7** Colleagues must maintain professional standards and boundaries at all times. This includes relationships with colleagues, parents/carers and members of the wider community. Any blurring of professional boundaries may compromise safeguarding and will be addressed through disciplinary procedures if necessary.

**5.8** OFG promotes a positive, supportive and enjoyable workplace culture. While fun at work is encouraged, colleagues must remain mindful of others and ensure their words and actions do not cross boundaries, cause offence, or undermine dignity. “Banter” must never be used as an excuse for behaviour that breaches our Sexual Harassment Policy or causes discomfort to others.

**5.9** All colleagues share responsibility for keeping each other safe. This includes challenging unsafe practices, supporting colleagues in distress, and reporting any concerns regarding the conduct or wellbeing of others.

**5.10** All systems, devices, emails, and digital platforms provided or accessed for work purposes must be used professionally and appropriately. Colleagues must not use them for writing, recording or sharing comments that are unprofessional, frivolous, or disrespectful. All use must comply with GDPR, Data Protection legislation and OFG policies, ensuring that information is accurate, necessary, and treated with confidentiality to keep everyone safe. Misuse of systems may result in disciplinary action.

## **6.0 SAFEGUARDING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS**

6.1 Colleagues should ensure they are familiar with the type of conduct which may be regarded as a breach of this policy. Examples of behaviour which are likely to be regarded to constitute gross misconduct are outlined in our Disciplinary Policy & Procedure. Failure to follow the Code of Conduct may result in disciplinary action with a possible summary dismissal outcome.

6.2 Outcomes First Group are committed to creating an open and





transparent culture, which allows colleagues to raise concerns even if this is in regard to a fellow peer.

- 6.3 Outcomes First Group is not bound by legislation in relation to disqualification by association. However, OFG takes its responsibility to safeguard our young persons, adults and children seriously and expects employees to notify their line manager if somebody with whom they hold a personal relationship (including online or living with) is under investigation by a statutory agency or is cautioned or convicted of an offence against a child, young person, or vulnerable adult. This should also include domestic violence when a child or young person may have been affected or at risk.
- 6.4 Employees must notify their line manager of relationships with each other, or individuals connected with children, young people, or adults so that a formal assessment of risk can be completed and maintained. This includes relationships with parents of children in Outcomes First Group care for example. A risk assessment will be completed to help mitigate any risks to colleagues and the people in OFG care or education.
- 6.5 Risk assessments should also be completed by Line Managers where relatives of colleagues work together and where colleagues reside in the same residential address.
- 6.6 All risk assessments completed by Line Managers should be reviewed and signed off by a Operations Director (or equivalent).
- 6.7 The relationship between a colleague and our young people or adults is one in which the colleague has a position of power or influence. It is vital for our colleagues to understand this power.
- 6.8 The potential for exploitation and harm of vulnerable people means that our colleagues have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 6.9 Colleagues are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent.
- 6.10 Colleagues need to recognise that it is not uncommon for our young people or adults to develop a “crush” or infatuation with them. Colleagues should make every effort to ensure that their own behaviour cannot be bought in to question. The senior manager should give careful thought to those circumstances and ensure a plan to



manage the situation is put in place.

6.11 Colleagues should be aware that even well-intentioned physical contact may be misinterpreted by the pupil, an observer, or any person who this action is described, colleagues should:

- Never touch a young person, adult or child in a way which may be considered inappropriate.
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny.
- Always allow/encourage young persons, adults and children where able to undertake selfcare tasks independently.
- Ensure the way they offer comfort to a distressed young persons, adults or children is age appropriate.
- Always tell a colleague when and how they offered comfort to a distressed young person, adult or child
- Be aware of young persons, adults and children's individual care plans and respond accordingly.
- Consider alternatives, where it is anticipated that a young person, adult or child might misinterpret or be uncomfortable with physical contact.
- Always explain to the young person, adult or child the reason why contact is necessary and what form that contact will take.
- Report and record situations which may give rise to concern.
- Be aware of cultural or religious views about touching and be sensitive to issues of gender.

6.12 When colleagues are dealing with behaviour management with our young persons, adults and children, colleagues should:

- Follow the site's behaviour management policy.
- Not use force as a form of punishment.
- Always try to defuse situations before they escalate e.g. by distraction.
- Always show empathy towards the young person or adult, particularly following a physical intervention when they may be upset or hurt.
- Keep parents or carers informed of any sanctions or behaviour management techniques used.
- Be mindful of and sensitive to factors both inside and outside of the setting which may impact on a young person's or adults' behaviour.





- Avoid shouting at children other than as a warning in an emergency/safety situation.
- Refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI).
- Be aware of the legislation and potential risks associated with the use of isolation and seclusion.
- Comply with legislation and guidance in relation to human rights and restriction of liberty;

6.13 When colleagues are dealing with a one-to-one situation they should:

- Ensure that wherever possible there is visual access and/or an open door in one-to-one situations.
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy.
- Always report any situation where a young person or adult becomes distressed or angry.

6.14 When colleagues are transporting young persons, adults and children and conducting home visits they should:

- Ensure that the service transport policy is followed and have an appropriate license / permit for the vehicle.
- Ensure the vehicle is signed out correctly and is in full working order.
- Plan and agree the arrangements for the visits with all parties involved in advance.
- Adhere to the agreed risk assessment put in place and always make detailed recordings of the visit.
- Colleagues should ensure they are fit to drive and are free from any drugs, alcohol or medicine which is likely to impair judgement and or ability to drive.
- Ensure that any emergency arrangements of lifts are recorded and can be justified.
- Always ensure the safety of our young persons and adults and be aware to never leave a young person, adult or child in your care alone. The young person or adult is the colleague's responsibility until this is safely passed over to a parent/carer.





- 6.15 All colleagues of Outcomes First Group have a duty to disclose any change in their circumstances or any information which may affect or is likely to affect the suitability of the colleague to undertake their job role or work with our young persons or adults.
- 6.16 Smoking is not permitted on any of our OFG properties. Colleagues must smoke away from property and never within the grounds, or insight of the young people / adults we support.
- 6.17 Colleagues must not attend work under the influence of drugs or alcohol under any circumstances nor should colleagues bring drugs or alcohol on to any Outcomes First Group premises.
- 6.18 Colleagues are not permitted to make or receive personal calls, texts, emails or access the internet for personal use during work time where young person's/adults are present. Personal mobile phones should be locked away during working hours. Colleagues must never use their personal equipment to take photos or make recordings of those in our care.
- 6.19 Company emails, documents and browsing history are monitored in accordance with data protection and privacy legislation. Any concerns regarding unauthorised, unacceptable or inappropriate use will be investigated further in line with our Disciplinary Policy.
- 6.20 A colleague/Line Manager must never be involved in a recruitment process or promotion decision where one of the applicants is a relative, partner or close friend and any process should be passed to another Line Manager to complete and HR/safeguarding made aware.

## 7.0 STANDARDS OF CONDUCT

- 7.1 Outcomes First Group does not expect all colleagues to be experts in legal matters; however, it is the responsibility of all colleagues to ensure they are familiar with the relevant laws, regulations, practices and code of practice that relate to their job. Colleagues should seek advice from the relevant department if they have a question concerning the application of the law.





- 7.2 Colleagues should not accept any gifts, entertainment or personal favour which may be believed to have any influence on business.
- 7.3 Group funds will not be used without CEO consent or board approval in payments direct or indirect to government officials, people participating in government bodies, colleagues of state organisations or representatives of political parties, or for unlawful or improper purposes.
- 7.4 All colleagues should be treated with respect and dignity and should work in an environment free from verbal, physical and sexual harassment. We value the individual diversity and creative potential every colleague brings to our business.
- 7.5 Judgement about colleagues for the purpose of recruitment, development or promotion shall be made solely on the basis of the colleague's ability, behaviour and work performance.
- 7.6 If a colleague leaves their employment with Outcomes First Group it is still their duty to maintain confidentiality once they have left the Group.
- 7.7 Colleagues should not take public positions on behalf of Outcomes First Group without first obtaining the approval from the executive team. Approval will not be given to any political contributions which may seem excessive or inappropriate.
- 7.8 Colleagues should avoid conflicts of interest within the group in which their personal family or financial interests may conflict with the Group. Where potential conflict of interest may arise, the colleague must declare that interest in writing to [peopleadvice@ofgl.co.uk](mailto:peopleadvice@ofgl.co.uk). Examples of conflict to be declared include:
  - Recruiting a family member including extended family members, relatives and friends in any capacity
  - Recruiting a family member
  - Having an interest, directly or indirectly or through family, in a competitor, supplier or customer of the Group or one of its subsidiaries, or otherwise in an organisation that has or seeks to do business with the Group or one of its Group Companies.





- Inappropriately recruiting individuals from previous places of employment, for example, bringing in friends or former colleagues outside of a fair and transparent recruitment process.
- Acquiring an interest in property (such as real estate, patent rights or securities) where the Company has, or might have, an interest.

## **8.0 PROPERTY AND RESOURCES**

- 8.1 Information generated within the Group including research, development, data, costs, prices, sales, profits, markets, customers and methods of doing business is the property of the Group and must not, unless legally required, be disclosed outside the company without prior authority from an Executive Director.
- 8.2 Resources include assets such as materials, equipment, cash but also assets as such as computer systems, trade secrets and confidential information. Colleagues must observe the guidelines concerning the classifying and handling of documents and electronic data. The storage of personal data is governed by laws with which relevant colleagues should familiarise themselves with.

## **9.0 POLICIES, DELEGATED AUTHORITIES AND RESERVED POWERS**

- 9.1 Colleagues are expected to be aware and comply with all group policies and delegated authorities established by the board. We give our colleagues the freedom to carry out their jobs and trust our colleagues to exercise the spirit of our policies and procedures. We empower our colleagues to carry out their responsibilities within a necessary framework of corporate and legal responsibility.

## **10.0 FINANCIAL AND OTHER RECORDS, DISCLOSURES AND COMMUNICATIONS**

- 10.1 All colleagues are required to keep accounts and any other records which give a view of financial position, results of operations, transactions and assets up to date and accurate. Records should be kept in accordance with the groups policies and relevant accounting standards.
- 10.2 Colleagues must ensure that all reports published, filed or submitted



to shareholders or regulators and full, fair, accurate, timely and understandable. They must not mislead the reader not omit anything necessary to make them full fair and accurate.

## **11.0 PROCEDURES FOR RAISING INTEGRITY CONCERNS**

- 11.1 A colleague having a direct or indirect financial interest in any item of business of the Group shall disclose the fact to his/her manager and shall not take part in any item of business in which he/she has a financial interest. If the manager is not appropriate, please contact the Group Director of Quality & Compliance.

## **12.0 ASSOCIATED POLICIES**

- Disciplinary Policy and Procedures
- *Keeping Children Safe in Education (KCSiE) Guidance*
- Company Vehicle Policy
- Safeguarding Policy
- Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings (2024/2025)
- Anti-Bribery and Corruption Policy and Gift and Hospitality (Gift Register) Policy
- Sexual Harassment Policy
- Alcohol Policy / Company Expenses Policy
- IT and Acceptable Use Policy (including GDPR and Data Protection compliance)

This policy applies within all companies, which are wholly owned subsidiaries of Blenheim Schools Group Ltd, a company registered in England, registered number 15274446

The registered office of all companies is Atria, Spa Road, Bolton BL1 4AG. Any enquiries regarding the application of this policy should be addressed to the Director of Information at the above address.



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