Staff Behaviour and Code of Conduct Policy

Wayland Stables Care Farm

Policy version: 2.0 - August 2026

Policy owner: Jake Payne, Business Manager

Safeguarding route: DSL and Deputy DSL named in the current controlled safeguarding-role record

Approval date: To be completed on approval

Effective date: Upon approval

Next review: August 2027, or sooner after a material legal, safeguarding or organisational change

> **Immediate rule:** Protect the person first. Call 999 for immediate danger or a crime in progress. Report any concern about a child, adult participant or adult working at WSCF without delay through the route in section 14. Do not investigate it yourself, confront the person concerned, promise secrecy, ask leading questions, delete evidence or wait for proof.

1. Purpose and status

This policy defines the conduct and safer-working standards expected of every adult working for or on behalf of Wayland Stables Care Farm (WSCF). Adults at WSCF are in positions of responsibility and, where they work with children or adults at risk, positions of trust. They must act with integrity, professional curiosity, sound judgement and appropriate boundaries, and must be able to explain their decisions.

WSCF is a non-school alternative provider, not a school merely because a commissioning school places a child here. Keeping Children Safe in Education (KCSIE) does not automatically impose every school duty directly on WSCF. WSCF nevertheless adopts the relevant KCSIE 2026 staff-code, allegations and low-level-concerns practices as its safeguarding benchmark and will meet any lawful placement or contractual requirements agreed with commissioners.

This policy is a condition of work or engagement but does not replace a contract, disciplinary procedure, safeguarding policy or professional code. A possible breach will be assessed fairly and proportionately. Outcomes may include guidance, training, management action, restrictions, disciplinary action, termination of an engagement, referral to an employer, commissioner, LADO, police, DBS or other body, according to the facts and legal duties.

2. Scope and linked controls

This policy applies to Business Owners, employees, casual and agency workers, volunteers, students, apprentices, contractors, consultants, visiting professionals and anyone else working for or representing

WSCF, on site, off site, during transport, online or at a work-related event. Relevant standards may also apply outside work where conduct creates a safeguarding, safety, trust, reputation or suitability risk.

It must be read with the Safeguarding and Child Protection Policy, Adult Safeguarding Policy, Behaviour Policy, Anti-Bullying Policy, Equality, Diversity and Inclusion Policy, IT/Internet/Online Safety Policy, Data Protection Policy, Mobile Phone/Smoking/Vaping Policy, Health and Safety Policy, Minibus Policy, Complaints Procedure, Serious Incident Policy, whistleblowing and disciplinary arrangements, role description, placement agreement and participant-specific plans.

> **Commissioner boundary:** A commissioning school or local authority retains responsibility for the placement it arranges and its own statutory duties. WSCF controls the conduct of people it employs or engages and must share necessary concerns and assurance with the commissioner. Neither party may assume the other has reported, recorded or acted.

3. Framework and core standards

This policy is informed by the Children Acts 1989 and 2004; Sexual Offences Act 2003 position-of-trust provisions; Safeguarding Vulnerable Groups Act 2006; Equality Act 2010; Care Act 2014; UK GDPR and Data Protection Act 2018; Working Together to Safeguard Children 2026; KCSIE 2025 until 31 August 2026 and KCSIE 2026 from 1 September 2026; DfE non-school alternative-provision voluntary national standards; Acas disciplinary guidance; and applicable health-and-safety, whistleblowing and commissioner requirements.

- put the welfare, dignity, rights and safety of children and adult participants before convenience, loyalty, reputation or personal interest;
- act honestly, lawfully, reliably and within competence, training, authorisation and agreed plans;
- treat people fairly and respectfully; challenge discrimination, harassment, sexualised conduct, bullying and degrading language;
- maintain professional boundaries and avoid conduct that could exploit trust, create secrecy, foster dependency, favour a person or reasonably be misinterpreted;
- use WSCF resources, information, systems, vehicles, animals and money only for authorised purposes and protect them from misuse;
- record and report concerns, mistakes, injuries, conflicts and near misses promptly and accurately, including self-referral where appropriate; and
- cooperate with safeguarding, safety and employment processes while preserving confidentiality and evidence.

4. Roles and accountability

Role	Core responsibility
Business Owners	Approve this policy; model the standards; provide independent oversight and resources; arrange a conflict-free route for concerns involving a senior leader or owner.
Jake Payne - Business Manager / policy owner	Implement the code, induction and assurance; ensure concerns reach the correct safeguarding or employment route; appoint an uninvolved case manager where required; review patterns and actions.

Role	Core responsibility
Designated Safeguarding Lead and Deputy	Receive and act on child and adult safeguarding concerns within their remit; advise on immediate protection, information sharing and commissioner or statutory referrals. Current post-holders are recorded in the controlled safeguarding-role record.
Lead on duty / activity lead	Maintain safe staffing, risk controls and visibility; challenge unsafe or inappropriate conduct; preserve evidence and report without attempting a safeguarding investigation.
All workers and volunteers	Know and follow this policy; remain within role and competence; report concerns about themselves or others; complete training; cooperate with proportionate supervision and review.
Agencies, contractors and commissioners	Share necessary conduct and safeguarding information, act on concerns about their personnel or placements, and coordinate without delaying WSCF's immediate protective action.

> **Conflict or absence:** A named person's absence does not suspend a duty. Jake Payne must identify a competent interim route. A concern about Jake Payne goes to an uninvolved Business Owner and directly to the safeguarding lead or external authority where relevant. A concern about a Business Owner goes to the other uninvolved owner or a suitable independent person and must not be screened by the subject of the concern.

5. Professional relationships and position of trust

Relationships must be warm, respectful and purposeful without becoming personal, exclusive, secret or dependent. The adult carries responsibility for the boundary, even when a child or participant initiates contact, expresses affection, behaves provocatively, or is close in age to the adult.

- never pursue, encourage or enter a sexual or romantic relationship with a child; never engage in sexualised communication, grooming or exchange of sexual images; recognise that position-of-trust offences can apply even where a child under 18 appears to consent;
- do not develop a sexual or exploitative relationship with an adult participant, and do not use access gained through WSCF for personal, financial or emotional advantage;
- do not create secrets, private arrangements, pet names with sexual or romantic meaning, promises of special access, or contact that bypasses approved systems;
- avoid favouritism and exclusive attention; give praise, comfort, rewards and opportunities fairly and in line with assessed need;
- do not share unnecessary personal problems, sexual or relationship information, home details or private contact information, and do not ask participants to keep adult information confidential;
- do not arrange private meetings, babysitting, employment, visits to a home, lifts or social contact with a current participant or their family outside approved duties; disclose any unavoidable pre-existing family or community relationship and agree controls; and
- report immediately any boundary crossing, infatuation, sexualised behaviour, concerning contact, accidental private encounter or situation that could be misunderstood.

6. One-to-one, off-site and transport work

One-to-one and off-site activity must be necessary, authorised and covered by the placement/activity risk assessment. Adults must use the agreed location, staffing, communication and check-in controls; remain observable or interruptible where practicable; record any material departure; and never turn a safety control into a barrier to confidential safeguarding disclosure.

- avoid isolated, locked or concealed spaces; use rooms or areas with appropriate visibility while respecting dignity and confidentiality;
- do not change a destination, extend a session, transport an unlisted passenger or make an unplanned stop except for safety, welfare or emergency reasons, and report the change promptly;
- follow the Minibus Policy for driver authority, manifests, escorts, restraints, handover, breakdowns and end-of-route sweeps; no unauthorised lift in a private vehicle;
- for home or community work, use an approved plan, work contact method and lone-working/check-in controls; do not enter a private setting when risk has changed beyond the plan; and
- record and report significant incidents, allegations, injuries, disclosures, missing-person events or unexpected contact before the end of duty, and immediately where risk is ongoing.

7. Physical contact, personal care and restrictive intervention

Physical contact must have a clear welfare, care, instructional or safety purpose; be proportionate, culturally and individually sensitive; respect communication and consent; and stop if the person indicates discomfort unless immediate protection makes brief proportionate action necessary. Adults should describe what they intend to do where practicable and record contact that is unusual, disputed, injurious or part of an incident.

- never use corporal punishment, pain, humiliation, intimidation, rough handling, horseplay, sexually suggestive touch or contact for the adult's gratification;
- use demonstration or practical support only when needed and in the least intrusive way; consider alternatives and the person's plan, disability, trauma, sensory profile and communication needs;
- provide intimate or personal care only when authorised, trained and covered by an individual plan that protects choice, privacy, dignity and safeguarding; report any concern or significant departure;
- use restrictive intervention only under the current Behaviour Policy and applicable guidance, as a last resort where lawful, necessary and proportionate; never as punishment, compliance or convenience; and
- obtain first aid or medical help, record injury and notify safeguarding/management routes after any physical incident as required by the relevant policy.

8. Communication, devices, images and online conduct

Work communication must use approved accounts, systems, devices and group/contact arrangements. Staff must follow WSCF's stricter whole-site personal-device rule and must never give a participant access to a personal phone or account. Exceptions for emergency, disability, medical need, authentication or an authorised task follow the IT/Online Safety and Mobile Phone policies.

- never use a personal email, messaging account, social-media direct message, disappearing message, gaming platform or private group to communicate with a child or participant;

- do not accept or initiate participant/family social-media connections during the professional relationship; disclose unavoidable existing links and apply agreed privacy controls;
- never photograph, film, audio-record or store participant information on a personal device; use only approved equipment, consent/lawful authority, minimum necessary content and secure storage;
- do not create, request, alter, share or retain sexual, humiliating, discriminatory or deceptive content, including AI-generated images, deepfakes or simulated messages involving a participant or colleague;
- do not input identifiable, safeguarding, health, placement or confidential information into an unapproved AI or online service, and never rely on automated output for a safeguarding or high-impact decision;
- keep language professional in radio, email, records and informal channels; humour, emojis or nicknames must never become sexualised, discriminatory, mocking or secretive; and
- preserve harmful digital evidence safely: do not forward sexual images or search a device beyond authority; report immediately and follow the safeguarding/online-safety procedure.

9. Confidentiality, records and information sharing

Confidentiality is not secrecy. Information must be accurate, respectful, necessary and shared only with people who have a legitimate role, but data protection must never be used as a reason to withhold information needed to protect a child or adult. Staff must explain honestly that a safeguarding disclosure cannot be kept secret and pass it promptly to the safeguarding route.

- make contemporaneous factual records using the person's own words where relevant; distinguish observation, allegation, professional judgement and action; do not alter, backdate or destroy a record;
- use approved storage and minimum access; do not keep WSCF records in personal notebooks, downloads, clouds, devices or accounts;
- do not discuss participants, families, colleagues, incidents or investigations where unauthorised people may hear, including at home or on social media;
- share commissioner, police, social-care, LADO, health or regulator information through the controlled route and record what was shared, with whom, why and when; and
- report misdirected messages, lost records, unauthorised access or other personal-data incidents immediately under the Data Protection Policy.

10. Dignity, equality and language

Staff must promote an environment free from discrimination, harassment, victimisation, sexual harassment, bullying and prejudice-based conduct. They must make agreed reasonable adjustments and treat children's and adults' identities, beliefs, families, communication, disability and personal care with dignity while following safeguarding, sex-specific privacy and risk controls in current WSCF policy.

- challenge slurs, sexual comments, misogyny, racism, homophobia, biphobia, transphobia, ableism, ageism, harassment and degrading 'banter' rather than treating them as normal;
- do not shout aggressively, threaten, shame, ridicule, mimic, deliberately misname, isolate or use sarcasm to control a person;
- use calm, clear and accessible communication; adapt pace, format and expectations without infantilising the person or lowering essential safety standards; and

- report discriminatory or sexualised incidents through both the behaviour/EDI route and safeguarding route where welfare risk may be present.

11. Safe work, fitness, appearance and property

Staff must arrive fit, punctual and properly equipped; follow risk assessments, training, PPE, hygiene, infection controls and emergency instructions; and stop work outside their competence or where conditions are unsafe. Clothing and footwear must be practical for weather, animals, vehicles, machinery and activities, preserve dignity, and display no offensive or discriminatory wording or image.

- do not work while impaired by alcohol, illegal drugs, misuse of medication, fatigue or illness; seek confidential advice and tell the appropriate manager when prescribed or over-the-counter medication may affect safety;
- follow the smoke/vape-free, phone-free and substance controls; never supply a participant with alcohol, nicotine, medication, controlled drugs or another unauthorised substance;
- do not use machinery, vehicles, tools, animals, medication or hazardous substances without authority, competence and required checks; report defects, injuries and near misses;
- protect keys, badges, passwords, radios, vehicles, money and equipment; do not lend, remove, alter or use WSCF property for private purposes without permission; and
- never ask a child or participant to conceal a safety breach, do an adult's prohibited task, enter an unsafe area or take responsibility beyond their agreed plan.

12. Gifts, money, hospitality and conflicts

Staff must not use their role for private gain. They must declare actual, potential or perceived conflicts, including family, friendship, financial, supplier, recruitment, placement and social-media connections, before participating in a decision. WSCF will record the conflict and remove or supervise the person where needed.

- do not borrow from or lend money to a participant or family, sell personal goods or services, fundraise privately, handle their bank card/PIN, or enter a private business arrangement;
- do not give personal gifts, cash or preferential rewards to a participant; any approved recognition must be transparent, proportionate and consistent with the programme;
- declare gifts or hospitality offered or received and follow the controlled approval/recording route; refuse anything intended, or reasonably likely, to influence a decision;
- make purchases, expenses, timesheets, mileage, attendance and resource records honestly; never falsify, split or conceal a transaction; and
- do not participate in a recruitment, complaint, disciplinary, placement, assessment or procurement decision involving a close personal interest without recorded independent oversight.

13. Conduct outside work and duty to disclose

WSCF does not regulate lawful private life without reason. However, staff must promptly disclose to Jake Payne or an uninvolved Business Owner any arrest, charge, caution, conviction, restraining order, professional restriction, barring/prohibition information, safeguarding enquiry, relevant complaint, loss of driving entitlement or other change that may affect role suitability, safety, insurance, trust or a

legal/contractual check. Disclosure is not an admission and will be assessed confidentially and proportionately.

Online or public conduct may be relevant when it identifies participants, discloses confidential information, promotes hatred or violence, sexualises children, undermines safeguarding, targets colleagues or families, falsely claims to speak for WSCF, or creates a credible transferable risk. Staff must not retaliate against, intimidate or campaign about a person involved in a complaint or investigation.

14. Safeguarding concerns, allegations and low-level concerns

The term 'low-level' does not mean insignificant. It covers any concern, however small or based on a sense of unease, that an adult may have acted inconsistently with this code, including outside work, but the information does not appear to meet the harm threshold. Staff are encouraged to self-refer where their own conduct could be misinterpreted, appeared compromising or fell below the standard.

Concern	Immediate route
Immediate danger, serious injury or crime in progress	Call 999. Protect people, preserve the scene/evidence and notify the DSL/lead on duty and Jake Payne as soon as safe.
Concern about a child or adult participant	Report immediately to the current safeguarding lead or deputy under the relevant safeguarding policy. Do not investigate or promise confidentiality.
Adult may have harmed a child, committed a related offence, posed a risk of harm, or behaved in a way indicating possible unsuitability to work with children	Report immediately to the designated case-management route and safeguarding lead. Obtain LADO advice/referral in line with local procedure; include conduct outside work and non-recent allegations. If uncertain whether the threshold is met, consult the LADO.
Low-level concern about an adult	Report promptly, and normally the same working day, to Jake Payne and the safeguarding lead through the controlled route. If either is involved, use the uninvolved-owner/external route. Concerns about agency/contractor staff are also notified to their employer.
Concern about Jake Payne or a Business Owner	Report to an uninvolved Business Owner and directly to the safeguarding lead, LADO, police, commissioner or other authority where the nature/urgency requires. The subject must not manage the concern.
Unsafe practice, wrongdoing or concern not addressed	Use the whistleblowing procedure and escalate externally where necessary, including the NSPCC Whistleblowing Advice Line for child-protection failures. Genuine concerns raised in good faith must not attract retaliation.

Low-level concern records must state the concern, context, source where known, action, rationale and outcome; be stored securely and confidentially; be reviewed for patterns; and be retained in line with the controlled retention schedule. Anonymous reporting will be respected as far as reasonably possible, but complete anonymity cannot be guaranteed where fairness, protection or law requires disclosure.

15. Response, investigation and employment action

WSCF will first secure immediate safety and obtain safeguarding, LADO, police, commissioner, HR or legal advice as appropriate. It will then decide the correct process and case manager, manage conflicts, preserve

evidence, protect confidentiality and avoid action that could compromise a statutory investigation. Referral duties continue even if the person resigns, an engagement ends or the allegation is withdrawn.

- risk controls may include additional supervision, changed duties, restricted systems/site access, redeployment or suspension; suspension is a neutral precaution, not an automatic response or disciplinary finding, and alternatives must be considered;
- the person raising the concern, the child/adult and the person who is the subject of it will receive appropriate support and information within safeguarding, confidentiality and legal constraints;
- where an employment process is appropriate, WSCF will investigate reasonably, explain the concern, allow a fair response and representation where applicable, decide on evidence, give reasons and offer any applicable appeal in line with the disciplinary procedure and Acas Code;
- an unsubstantiated, unfounded, false or malicious outcome will be recorded accurately; a mistaken or unproven report made in good faith is not misconduct; deliberately false or retaliatory reporting may be addressed fairly; and
- WSCF will complete required referrals or notifications, review organisational learning, repair unsafe systems and provide proportionate commissioner assurance without disclosing unnecessary personal information.

16. Training, assurance and review

All covered people must receive this policy before unsupervised work, confirm understanding, complete role-appropriate safeguarding and safer-working induction, and receive updates after material change. Managers must create conditions in which people can ask for advice or self-refer early without normalising unsafe conduct.

Jake Payne will review implementation at least annually and after a serious incident, pattern of low-level concerns, legal/guidance change or material service change. Assurance will cover induction acknowledgements, training, supervision, concern routing and timeliness, pattern review, commissioner feedback, whistleblowing access, conflicts, device/image compliance, lessons and overdue actions. Equality and privacy impacts must be considered.

Appendix A - Staff quick guide

Do	Do not
Protect first; call 999 for immediate danger; report promptly through the correct safeguarding or management route.	Do not investigate, confront, promise secrecy, wait for proof, delete evidence or assume someone else has reported.
Keep relationships warm, fair, observable and purposeful; disclose unavoidable prior connections and boundary concerns.	Do not create secret, sexual, romantic, exclusive, financial or dependent relationships.

Do	Do not
Use approved accounts, devices, transport and recording systems; follow individual plans and risk controls.	Do not use personal messaging, devices, images, lifts, AI tools or private meetings for participant work.
Use proportionate, respectful support and record unusual physical contact or departures from plan.	Do not punish through pain, humiliation, intimidation, restraint, isolation or deprivation.
Self-refer mistakes or situations that could be misunderstood; challenge discriminatory, sexualised or unsafe conduct.	Do not dismiss a 'nagging doubt' as too small, protect a colleague from scrutiny, retaliate or gossip.

Appendix B - Minimum concern record

- date, time, place, people involved and immediate safety action;
- exact concern, observation or disclosure, using the person's own words where relevant;
- whether the report concerns a child, adult participant, staff member, contractor or other person;
- evidence preserved and any injury, digital content, witness or related record;
- person/route notified, time, advice or threshold decision, conflict check and interim controls;
- commissioner, LADO, police, social-care, DBS, regulator or employer notification where applicable;
- decision, rationale, support, outcome, learning, follow-up owner and completion date; and
- secure storage location, access restriction, retention decision and pattern-review date.

> **Record discipline:** Write facts and attributed accounts, not speculation. Do not combine the safeguarding record, employment investigation and general personnel note unless the controlled process requires it; cross-reference securely and limit access.

Sources and related guidance

Keeping Children Safe in Education 2026 (effective 1 September 2026) — Department for Education.

Keeping Children Safe in Education 2025 (in force to 31 August 2026) — Department for Education.

Working Together to Safeguard Children 2026 — Department for Education.

Non-school Alternative Provision: Voluntary National Standards — Department for Education.

Sexual Offences Act 2003 - abuse of position of trust — UK legislation.

Acas Code of Practice on disciplinary and grievance procedures — Acas.

Whistleblowing for employees and safeguarding whistleblowing routes — GOV.UK / Department for Education.

Revision history

Version / date	Change
1.0 - 4 August 2025	Original staff behaviour policy.
2.0 - August 2026	Full safer-working update: non-school AP status, child and adult coverage, position of trust, physical contact, devices/AI, conflicts, outside-work disclosure, harm-threshold and low-level concerns, whistleblowing, fair process and assurance.

Approval record

Approval field	Completion
Approved by	
Approval date	
Signature / recorded decision	
Next review	August 2027, or sooner if required