



Grimsby Town Sport and Education Trust

## CODES OF CONDUCT

Reviewed by	M. George (LDSO)
Date	26 <sup>th</sup> September 2019
Next Review	25 <sup>th</sup> September 2020

## **1. Purpose and Intent of this Code**

This is a Code of Conduct for all Grimsby Town Sport and Education Trust (GTSET) employees and volunteers giving clear guidance on expected standards of behaviour particularly in relation to safeguarding. The separate GTSET Policies on Safeguarding Children and Adults at Risk and Whistleblowing are complementary to this Policy and therefore need to be read in conjunction. Please ask the GTSET Lead Designated Safeguarding Officer for copies or visit the GTSET Staff Intranet to view them.

- 1.1. This Code of Conduct applies to:
  - All staff who are employed by GTSET including those employed through the NCS programme
  - All temporary and agency staff;
  - Volunteers working in school;
- 1.2. This Code of Conduct should be read and understood in the context of:
  - Your agreed job description;
  - Appropriate professional standards;
  - GTSET policies and procedures.
- 1.3. Adults have crucial roles to play in the lives of children. This Code of Conduct helps establish the safest possible learning and working environment which safeguards children and reduces the risk of adults being falsely accused of improper or unprofessional conduct. The purpose of this Code of Conduct is to provide a clear framework of expected and appropriate standards and behaviour to which all staff and volunteers are required to adhere and to raise awareness of illegal, unsafe and inappropriate behaviours.
- 1.4. This Code is not an exhaustive list of unacceptable or inappropriate behaviours but is designed to provide guidance and raise awareness of issues and situations which may arise. There will therefore be times when staff are required to exercise their professional judgement in situations not covered by this Code.
- 1.5. GTSET will provide this Code to all staff and volunteers on induction and should notify staff of the expectations therein. This document is provided so that members of staff are clear about professional conduct and boundaries. GTSET staff are in a unique position of influence and must adhere to behaviour that maintains public trust in the profession and set a good example to other staff. Staff are also expected to follow all reasonable requests from those supervising or managing their work.

This document is intended to help ensure that GTSET is a safe place, provide clarity as regards expectations of staff and avoid any conduct which would lead any reasonable person to question their motivation and intention. Deviation by a member of staff from this guidance may bring into question the staff member's suitability to work with children and young people.

- 1.6. References made to 'child' and 'children' refer to children and young people under the age of 18 years. However, the principles apply to professional behaviours towards anyone, including those over the age of 18 years. References to adults and staff refer to all those who work in a paid or unpaid capacity in GTSET. This also includes those who visit GTSET, e.g. sports coaches.

## **2. Conduct outside Work**

- 2.1 Staff must not engage in conduct (including other employment) outside work which could reasonably be expected to damage the reputation and standing of GTSET, GTFC. In particular, criminal offences, especially those which involve violence, possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and incompatible with continued employment with GTSET. Staff must exercise caution when using information technology, including social networking sites, and be aware of the risks to themselves and others. Staff may undertake work outside GTSET either paid or voluntary, subject to the contractual obligations and consent from GTSET which will not be unreasonably withheld.
- 2.2 Staff must inform the GTSET Manager immediately if they are arrested or subject to a criminal conviction or caution. Where safeguarding concerns arise, GTSET will carry out a formal risk assessment to identify and mitigate any potential risks to GTSET and GTFC staff.

## **3. Setting an example**

- 3.1 All adults who work for GTSET set examples of behaviour and conduct which may be used as a model by other staff. All adults must, therefore, demonstrate the highest standards of conduct. All adults must also avoid behaving in a way that risks giving rise to allegations of abusive or unprofessional conduct. This Code is intended to support all adults to understand what behaviour is and is not acceptable.

## **4. Making professional judgements**

- 4.1 This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, some examples of behaviour that is unlawful, inappropriate or inadvisable. There will be rare occasions and circumstances in which staff have to make decisions or

take action in the best interests of GTSET which are not dealt with in this guidance. Individuals are expected to make professional judgements in order to secure the best interests and welfare of the participants and pupils in their charge. Such judgements should always be shared with a senior member of staff, who may inform the child's parent/carer. Adults should always consider whether their actions are warranted, proportionate, safe and applied equitably.

- 4.2. Although this Code of Conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. In all matters relating to participant/staff relationships, GTSET staff must bear in mind how an action might reasonably be regarded by a third party.
- 4.3 All adults should understand the need to act as good role models for participants and pupils. GTSET expects all adults to behave in a thoroughly professional manner and to set an example to participants and pupils through high standards of behaviour.

## **5 Duty of Care**

- 5.1 GTSET staff are accountable for the way in which they exercise authority; manage risk; use resources; and protect participants and pupils from discrimination and avoidable harm. All staff, whether paid or voluntary, have a duty to keep children safe and to protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Children have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure the safety and well-being of pupils. Failure to do so may be regarded as professional neglect or misconduct.
- 5.2 The safeguarding culture of GTSET is, in part, exercised through the development of respectful, caring and professional relationships between adults, participants and pupils and behaviour by adults that demonstrates integrity, maturity and good judgement.

## **6. Staff/Participant/Pupil Contact**

- 6.1 As a general rule, GTSET staff should avoid unnecessary contact with participants/ pupils outside of GTSET.
  - They should not give participants/ pupils their personal contact details. GTSET letters to participants/ pupils should not contain these personal details.
  - They should not make arrangements to meet participants/pupils, individually or in groups, outside of GTSET duties.
  - They should avoid contacting participants/pupils at home unless this is strictly necessary; they should keep a record of any such occasion.

- They should not attend private participants/ pupil parties and should be aware of their professional standing and responsibilities.

6.2 There are occasions when adults embark on a course of behaviour known as grooming where the sole purpose is to gain the trust of a child, and manipulate that relationship so sexual abuse can take place. GTSET staff should be aware that consistently conferring special attention and favour upon a child might be construed as being part of a grooming process and as such will give rise to concerns about their behaviour.

6.3 It is accepted that the effective use of technology brings benefits to learning. Adults must ensure that they establish and adhere to safe and responsible practices. Communication between participants/pupils and adults, by whatever method, should take place within clear and explicit boundaries. This includes the wider use of technology and social networking. Adults should ensure that all communications are transparent and open to scrutiny. Adults should be circumspect in their communications with participants/ pupils so as to avoid any possible misinterpretation or their motives or any behaviour which could be construed as grooming. Staff should not request or respond to any personal information from children other than that which may be necessary in their professional role. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.

6.4 Staff should not be 'friends' with current or recent participants/ pupils on social media and should avoid other similar links on other social networking sites. Any invitation to become a 'friend' or similar should be politely declined.

6.5 Email, messaging or use of social media sites between adults and participants/pupils outside agreed protocols may lead to disciplinary and/or criminal investigations.

## **7. Language/Communication**

7.1 Staff should not swear, blaspheme or use any sort of offensive or inappropriate language in front of participants/ pupils. They should not use language which is discriminatory or demeaning in relation to gender (including gender reassignment), religion, race, nationality, ethnicity, sexual orientation, disability or age. Staff should not make sexual innuendos. Discussion of issues of a sexual nature (other than in the context of the curriculum as specified in Schemes of Learning) should be kept to a minimum and only conducted where necessary from a pastoral perspective. Any concerns should be reported to the GTSET Manager or Lead Designated Safeguarding Officer.

## **8. Physical Contact**

- 8.1. There are occasions when it is appropriate and proper for staff to have physical contact with participants/ pupils, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to any participants/ pupils needs and agreed care plan.
- 8.2. Not all participants/ pupils feel comfortable about certain types of physical contact; this should be recognised and wherever possible, adults should seek participants/ pupils` permission before initiating contact and be sensitive to any signs that they may be uncomfortable or embarrassed. Staff should acknowledge that some participants/ pupils are more comfortable with touch than others. Staff should listen, observe and take note of the participants/ pupil's reaction or feelings and, so far as possible, use a level of contact and/or form of communication which is acceptable to the job role.
- 8.3. Any physical contact should be in response to the needs at the time, of limited duration and appropriate to the age, stage of development, gender, ethnicity and teaching context. Adults should use their professional judgement at all times.
- 8.4. Physical contact may be appropriate where participants/ pupils are in distress and need comforting or if a member of staff has to give first aid. Parents should always be informed when first aid has been administered. Staff should use their own professional judgement when they feel participants/ pupils needs this kind of support and should be aware of any related special circumstances. Particular care must be taken in instances which involve the same participants/ pupil over a period of time.
- 8.5. Physical contact should never be secretive, for the gratification of the adult or represent a misuse of authority. If a member of staff believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances should be immediately reported to the GTSET Manager or the LDSO.
- 8.6. Extra caution may be required where it is known that participants/ pupils have suffered from previous abuse or neglect. Staff need to be aware that the participants/ pupils may associate physical contact with such experiences. Staff should also recognise that these Participants/ pupils may seek out inappropriate physical contact. In such circumstances staff should deter and help them to understand the importance of personal boundaries, reporting concerns to the GTSET Manager or the LDSO.
- 8.7. In certain curriculum areas, such as PE, staff may need to initiate some physical contact with participants/ pupils, for example, to demonstrate a technique in the use of equipment or an instrument. Physical contact should only take place when it is necessary in relation to a particular activity. The extent of contact should be made clear and undertaken with the permission of the participants/ pupils. Contact should be relevant to their age and

understanding. Adults should remain sensitive to any discomfort expressed verbally or nonverbally by the participants/ pupils.

- 8.8 It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping participants/ pupils informed of the extent and nature of any physical contact may also prevent misunderstanding and potential allegations.
- 8.9 By law, teaching staff may reasonably intervene to prevent participants/ pupils from:
- committing a criminal offence;
  - injuring themselves or others;
  - causing damage to property; and/or
  - Engaging in behaviour prejudicial to good order and to maintain good order and discipline.
- 8.10 Reasonable force is only appropriate where no other form of control is available and where it is necessary to intervene. Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age, sex and understanding of the participants/ pupils.
- 8.11 When physical intervention is deemed to be necessary in the circumstances listed above, GTSET staff must first, wherever practicable, tell the persons concerned to stop and what will happen if he or she does not. The member of staff must continue attempting to communicate with the participant/pupil throughout the incident and must make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.
- 8.12 Staff must always avoid touching or holding a participant/pupil in a way that might be considered indecent.
- 8.13 Any member of staff who is involved with or witnesses use of force in the ways just described must inform the GTSET LDSO immediately following the incident. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff involved must always provide a written report as soon as possible afterwards. The law allows anyone to defend themselves or another person against an attack provided they do not use more force than is necessary.

## **9. Isolation and One-to-One Working**

- 9.1 If a coach/member of staff is alone with a participant/pupil, he/she should ensure that any such meeting or lesson is as visible as possible and that it takes place in public or semi-public places such as the library or classrooms. As such he/she should ensure that the door to the room has a glass panel which is not obscured or is left open. If this is not possible then another adult must be close by. Furniture should also be positioned to allow easy access into or out of the room.

- 9.2 GTSET Staff working in one to one situations with children and young people may be more vulnerable to allegations and participant/pupil may be more vulnerable to harm by those seeking to abuse their trust. All staff should recognise this possibility and plan and conduct such meetings or lessons accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and participant/pupil are met. Managers should undertake a risk assessment in relation to the nature and implications of one-to-one working and individual risk assessments should be carried out in respect of adults for whom lone working is an integral part of their role. Any arrangements should be reviewed on a regular basis. It may be necessary to amend these to take account of particular participant/pupil needs. This does not mean that working one-to-one is unacceptable; it just requires a proportionate risk assessment.
- 9.3 No member of staff must ever be alone behind a closed or locked door with a participant/pupil. Staff should never arrange a one to one meeting in a remote or secluded area. Any meetings which take place outside agreed working arrangements should not take place without the agreement of the GTSET LDSO (Safeguarding Officer) or his/her deputy. Any incidents should be reported to the GTSET LDSO

## **10 Relationships**

- 10.1 As a result of their knowledge, position and/or the authority invested in their role, all those working with children are in a position of trust in relation to participant/pupil.
- 10.2 The relationship between people working with children is one where the adult has a position of power or influence. It is vital for all adults to understand this power; that the relationship cannot be one between equals and the responsibility they must exercise as a consequence. The potential for exploitation and harm of vulnerable pupils means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 10.3 The participant/pupil in our care is best served by a pastoral approach that is concerned, collective and thorough, but professionally detached. We do not serve participant/pupil well by encouraging situations in which participant/pupil develop excessive reliance on individuals.
- 10.4. It is unacceptable for a member of staff to have any kind of sexual or intimate relationships/contact with a participant/pupil of any age or to encourage such relationships/contact.
- 10.5 Such relationships/contact are a serious breach of trust and professional standards even where the pupil is over 18. Under the Sexual Offences Act 2003 it is a criminal offence for any GTSET staff member to involve a participant/pupil under 18 in a sexual activity regardless of whether or not the participant/pupil consents to that activity. The sexual activity referred to does

not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. The 2015 Government Publication: 'Working Together to Safeguard Children', defines sexual abuse as, "Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

## **11 Confidentiality and Data Protection Safeguarding**

- 11.1 Staff must respect the privacy of participant/pupil, and colleagues and must not pass confidential or sensitive information to any third parties (including addresses or telephone numbers), without checking first with the person concerned.
- 11.2 In some circumstances GTSET staff may have access to confidential information relating to participant/pupil. These details must be kept confidential at all times and only shared when legally permissible and in the interests of the participant/pupil.
- 11.3 Information about participant/pupil, or colleagues must never be disclosed to telephone enquirers. Staff should ask the enquirer to put the request in writing so that it can be dealt with appropriately.
- 11.4 The storing and processing of personal information about participant/pupil and staff is governed by the General Data Protection Regulations 2018 and when handling such information all staff must comply with the GDPR Principles which are set out in this Act.
- 11.5 If a staff member is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the GTSET Manager or the LDSO. Any actions should be in line with locally agreed Information sharing protocols. Staff should never use confidential or personal information about a participant/pupil or his/her family for their own, or others advantage. Information must never be used to intimidate, humiliate or embarrass. Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.
- 11.6 There are circumstances in which a member of staff may be expected to share information about a participant/pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities. GTSET's Safeguarding Children and Young People Policy and Procedures must always be followed.

## **12 Transport**

- 12.1 In certain situations e.g. staff or volunteers may agree to transport children. A designated member of staff is appointed to plan and provide oversight of all

transport arrangements and respond to any difficulties that may arise. Staff should not transport participant/pupil in their own vehicles or alone unless this is unavoidable, in which case specific approval from the designated member of staff should be obtained in advance. Where this is not possible, for example in an emergency, the incident should be reported to the GTSET Manager.

- 12.2 Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured for business purposes and that the maximum capacity is not exceeded. All adults whether staff or volunteers in regulated activity should have a current and satisfactory enhanced DBS disclosure and barred list check.

### **13. Electronic Communication**

- 13.1 All staff using e-mail should be aware of the less formal style that can characterise this form of communication and should ensure that e-mails do not convey an inappropriate or overly familiar tone. There are occasions when children, young people or parents wish to pass small tokens of appreciation to adults e.g. on special occasions or as a thank you and this is acceptable although if the member of staff feels that this may indicate a crush or infatuation he/she should refer this matter to the GTSET LDSO. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

### **14. Socialising**

- 14.1 GTSET staff have a professional duty to set a responsible example to participant/pupil. Staff should not put themselves in a position which may compromise their professional status. Staff should bear in mind that most participant/pupil have mobile recording and photographic technology to hand, and the potential this has for comments or actions to be recorded out of context.
- 14.2 On occasions when staff are socialising in groups, in public locations, it is important that professional standards are maintained and no opportunity is given to participant/pupil to compromise these. If staff become aware that participant/pupil are socialising in the same venue, staff are encouraged to consider changing their plans. There may be times when this is difficult, for example at a restaurant, and in these circumstances staff are strongly advised to moderate their behaviour accordingly.

### **15. Use of images**

- 15.1 There are no circumstances that will justify adults making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.

- 15.2 If indecent images of children are discovered at the establishment or on the GTSET equipment an immediate referral will be made to the LADO and the police.
- 15.3 Under no circumstances should any adult use GTSET equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. This will raise serious concerns about the suitability of the adults to continue working with children and young people.
- 15.4 Parental consent on the taking of and use of Photographs and Images, for example on the Club Website or Social Media, must always be obtained using the GTSET "Use of Photographic Images Consent Form".

## **16. Dress and appearance**

- 16.1 GTSET staff should dress and present with appropriate appearance appropriate to their professional role; this may be different to that adopted in their personal life. Staff should ensure they are dressed smartly, decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be viewed as offensive or inappropriate will render themselves vulnerable to criticism or allegation.

## **17. Reporting of Concerns**

- 17.1 Any event which causes a member of staff to fear that a participant/pupil has suffered or is at risk of suffering harm or that another adult has failed to maintain professional boundaries or may pose a threat to children or young people must be reported immediately to the GTSET Manager or LDSO.
- 17.2 If the allegation or concern involves the GTSET Manager or LDSO, the staff member should report it directly to the Chair of Trustees. It is important however to emphasise that any member of staff, parent or student can refer their concerns to the local authority children's social care team directly: see the Safeguarding Policy for further details.

## **18. Whistleblowing**

- 18.1 Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. Staff should follow the GTSET Whistleblowing Policy. Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.

## **Conclusion: Implementation and Review**

This Code of Conduct and the information contained therein is relayed to GTSET staff including agency personnel and volunteers through the Programme's regular Induction Courses and other training. The document is

reviewed annually or more frequently should any changes in circumstances or legislation warrant such review by the GTSET Manager; GTSET Safeguarding Lead Designated Officer.