

# Staff Behaviour Policy

This document provides a guide for adults working and volunteering in CPM Sounds CIC regarding acceptable and desirable conduct to safeguard learners.

Policy agreed (date):	6/12/25
Policy published (including on website) (date):	10/12/25
Next review (date):	6/12/25

Key Personnel			
Role	Name	Tel.	Email
Proprietor	Thomas Mallard	07792 059216	contact@riverbankchippenham.co.uk
Designated Safeguarding Lead (DSL)	Thomas Mallard	07792 059216	contact@riverbankchippenham.co.uk
Deputy DSL(s) (DDSL)	.	.	.
Trustee responsible for safeguarding	Thomas Mallard	07792 059216	contact@riverbankchippenham.co.uk

<b>Children's Social Care referrals:</b> Integrated Front Door – Multi-Agency Safeguarding Hub (MASH)	0300 456 0108
<b>Vulnerable Adults Social Care referrals:</b> Integrated Front Door – Multi-Agency Safeguarding Hub (MASH):	0300 456 0111
<b>Out of hours:</b>	0300 456 0100

If you believe a learner is **at immediate risk** of significant harm or injury, you **must** call the police on 999.

## Introduction

CPM Sounds CIC is committed to providing positive academic, social and emotional outcomes for our learners, underpinned by a strong safeguarding ethos. We are equally committed to the welfare of our staff, who are expected to adhere to the highest standards of professional behaviour to maintain confidence and respect of the general public and colleagues.

The managing director will make sure that this policy reflects national and local requirements to protect and support the learners we work with.

We will fulfil our local and national responsibilities as laid out in the following key documents:

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (Sept 2025)
- The Procedures of Safeguarding Vulnerable People Partnership

This policy:

- Takes account of the Guidance for Safer Working Practice for those working with children and young people in education settings (2020).
- aims to provide a guide for adults about acceptable and desirable conduct to ensure that staff maintain safe working practice and so safeguard children and vulnerable adults.
- does not provide a complete checklist of appropriate behaviour for staff in every circumstance. Staff must make judgements about their behaviour to secure the best interests and welfare of the learners in their charge and, in so doing, will be seen to be acting reasonably.

In *very exceptional* circumstances where a member of staff believes it is in the best interest of a learner or member of the wider community, to breach these guidelines, that person **must** tell the proprietor of the justification for any proposed, or action already taken, at the earliest opportunity. The proprietor will make a written record of that discussion including any areas of disagreement and actions taken.

## Scope

This policy is consistent with all other CPM Sounds CIC policies and should be read alongside the **Safeguarding policy** as well as the following documents relevant to the safety and welfare of our learners:

- Behaviour policy
- SEND policy
- Lone Worker Policy
- Health and safety policy
- Whistleblowing policy

**This policy applies to all staff and volunteers working at our school.**

For the purposes of this policy:

- **Staff** refers to all those working for or on behalf of the organisation full time or part time, in a paid or regular voluntary capacity.
- **A volunteer** is a person who performs an activity that involves spending time, unpaid with our organisation (except for approved expenses).
- A **'position of trust'** is one in which one party is in a position of power or influence over another, due to their work or the nature of their activity.
- **Child** refers to all children attending our provision and any child under the age of 18 who encounters our organisation. This includes unborn babies.
- **It does not apply to** employees of external contractors and providers of services (eg contract cleaners). Such staff are covered by the relevant Code of Conduct of their employing body.

## Expectations

All staff:

- are familiar with this policy and have an opportunity to contribute to its review.
- understand their responsibilities to safeguard and promote the welfare of children and vulnerable adults.
- are aware that failure to meet the standards of behaviour and conduct in this policy may result in disciplinary action. This includes dismissal, criminal action and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity.

## Mandatory Procedures

### Confidentiality

The sorting and processing of personal information is governed by GDPR (General Data Protection Regulations 2018) - see Data Protection Policy .

Learner records are shared with those who have a professional need to see them. When staff have access to confidential information about colleagues, children or their parents/carers, the staff must treat such information in a sensitive and confidential way, sharing it only in the interests of a learner and when legally permitted to do so.

Staff will not use their position to gain access to information for their own advantage and/or a learner's or family's detriment.

If a member of staff is concerned that a learner is being abused, is at risk of being abused or may have been abused in the past, they will follow the agreed procedure set out in the flowchart 'What to do if you are worried about a child', displayed in the staff room/staff cloakrooms, See Safeguarding Policy (DEC 2025).

If a member of staff is ever in any doubt about whether to share information or not, they should get advice from the designated safeguarding lead.

### Staff relationships with learners and parents

#### Staff responsibilities

All staff know that:

- they are in positions of trust in relation to all children (and learners over the age of 18) on roll. They ensure that the power imbalance is never used for personal advantage or gratification. They avoid behaviour which might be interpreted by others as an abuse of the position of trust, and report any incident with this potential to the manager. This includes sharing personal contact details with learners or families.
- they have a legal duty to protect the interests of children and accept the obligations inherent in that responsibility.
- they must not establish or seek to establish social contact with learners to secure a friendship or to pursue or strengthen a relationship.
- they must inform the proprietor of any pre-existing (prior to the member of staff or learner starting at the setting) or new relationship with a learner or close family member, which they feel, might compromise the organisation or their own professional standing.
- they should disclose any relationship or association (in the real world or online) that may impact on the organisation's ability to safeguard children.

- it is an offence (Sexual Offences Act 2003) for a member of staff in a position of trust to engage in **any** form of sexual activity with a child under the age of 18.

Certain behaviours are at odds with a position of trust. These include, but are not limited to:

- Harassment or discrimination based on any characteristic protected by the Equality Act 2010
- Loss of personal civility including, personal attacks or insults, displays of temper (such as throwing objects), unwanted physical contact (pushing, shoving, hitting) or the threat of the same.
- Staff must not swear, blaspheme or use offensive language in front of learners, nor use language which is discriminatory and demeaning in any way.

Such behaviours are disciplinary offences and may be referred to Local Authority and/or the police.

### **Communication with learners and parents, including social contact outside of the workplace**

Staff must use their professional judgement when requesting or accepting any social contact (including through social media). This means that they must:

- not accept any request from learners for contact via any social media platform.
- make a judgement about whether to maintain the connection in any cases where contacts were made before the learner started at CPM Sounds CIC (eg staff member being friend with a parent). Staff must discuss any decision to maintain such contact with the proprietor.

We acknowledge that staff may have friendships and social contact with parents of learners outside of the organisation. Staff will not engage in conduct outside work that could damage their professional reputation or the reputation of the organisation.

Any contact between staff and learners and/or parents that is deemed to bring the organisation into disrepute or that might lead a reasonable person to question the staff member's motivation or intentions will always be investigated and could lead to disciplinary action.

Staff must not make sexual innuendos or any comments of a sexual nature to any learner (other than in the context of sex and relationship education in the PSHE curriculum), nor make any comments trivialising alcohol or drug abuse.

Occasionally, learners may develop an infatuation for a member of staff. In such situations, the advice of the proprietor must be sought. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is beyond reproach.

Staff must inform the proprietor of any proposed or pre-existing arrangements between them and the families of learners on roll that take place outside work eg baby-sitting, sports coaching, music tuition.

Staff are advised to wait until after an ex-learner's 18th birthday before accepting any request on social media. In the case of ex-learners who were adults while at the provision, staff should discuss the request with the proprietor before making a decision.

### **Gifts, rewards, favouritism and exclusion**

Staff must:

- declare any gift they receive from a parent or learner. This does not include small tokens of appreciation such as at Christmas or the end of the year.
- not give gifts to individual learners. Any rewards or treats will be given only as part of the organisation's agreed behaviour policy.
- advise the proprietor about the offer of any gift or hospitality, from outside or inside the organisation, which might be interpreted as an attempt to influence staff conduct towards learners, parents or other employees.

## **Physical contact including intimate/personal care and behaviour management**

It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one learner, in one set of circumstances, may be inappropriate in another, or with a different child or vulnerable adult. Any physical contact will be in response to the learner's needs, of limited duration and appropriate to their age, stage of development, gender, background and any agreed support or care plan.

The use of physical intervention including the use of reasonable force will always be in line with the following policies (Special Needs policy, Supporting learners with medical needs policy, Behaviour policy, Physical Intervention policy/procedures).

Staff understand that:

- on a daily basis, it may be entirely appropriate and proper for staff to have physical contact with learners and that they do so in ways appropriate to their professional role and in relation to the learner's individual needs.
- some learners are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others. Whenever possible, adults seek the learner's permission before initiating contact and are sensitive to any signs that the learner may be uncomfortable or embarrassed.
- they have a responsibility to ensure the way they offer comfort to a distressed learner is age appropriate.
- they must never touch a learner in a way which may represent a misuse of authority or considered indecent.
- physical contact must never be secretive, or for the gratification of the member of staff.
- they should be aware of cultural or religious views about touching and be sensitive to the issues of gender.

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 will be immediately reported to the DSL and recorded in writing. If appropriate, the DSL will consult with the Local Authority Designated Officer (LADO) or adult MASH.

Staff understand that a learner who has suffered previous abuse or neglect may associate physical contact with such experiences. They recognise that such a child or vulnerable adult may seek out inappropriate physical contact and know to deter the learner sensitively to help them to understand the importance of personal boundaries. Staff know that they must never indulge in play that involves rough-and-tumble or fun fights.

Learners with disabilities may require more physical contact to assist their everyday learning. The arrangements are understood and agreed by all concerned, justified in terms of the learner's needs, consistently applied and open to scrutiny. Staff always allow/encourage learners, where able, to undertake self-care tasks independently.

If a learner's behaviour presents a serious risk to themselves or others, a robust risk assessment and, where relevant, a physical intervention plan is always put in place and reviewed regularly. In all cases where physical intervention takes place, staff record the incident and subsequent actions and report these in line with CPM Sounds CIC behaviour and safeguarding policies.

## **First aid**

Staff adhere to the organisation's health and safety policy, the policy for supporting learners with medical conditions and for administering first aid or medication.

## **One to one situations**

Staff carefully consider the welfare needs of learners when with them in a one to one situation. All learning spaces are set up to allow any activity to be easily observed by other staff at the setting. Windows and doors are kept clear from display materials to allow rooms to be overlooked. Internal doors remain open when practicable. See lone working procedures/policy.

Learners are provided with age/developmentally appropriate advice about managing distressing feelings that may arise during 1-1 situations at CPM Sounds CIC. Staff will record any time a learner has appeared upset/angry during a 1-1 session and will report this to their line manager.

### **Home visits and transporting learners** See lone working procedures/policy.

All work with learners and parents/carers is whenever possible undertaken onsite. There are however occasions where it may be necessary to arrange a home visit eg as part of learner's induction programme. In such situations, staff will work in pairs. A risk assessment will be undertaken. Any member of staff transporting a learner in their own vehicle will:

- have prior written permission from parents (where appropriate) and the proprietor.
- have the appropriate vehicle insurance for business use
- have the correct ratio of children/adults
- ensure that all passengers wear seat belts
- ensure booster seats are used according to the current legislation

### **Educational Visits and After-School Activities**

Staff remain in a position of trust during school activities that take place off the setting or out of CPM Sounds CIC operating hours and so, they will ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Organisers will conduct risk assessments and adhere to Health and Safety guidelines. Staff/learner ratios will be specified and where overnight stays are involved, and the composition of groups of learners and the supervising staff will be carefully planned to keep all learners and staff safe.

Where out of setting activities include overnight stays, careful consideration will be given to sleeping arrangements as part of the planning process. Learners, staff and parents (where appropriate) will be informed of these arrangements prior to the start of the trip and any proposed changes to the plans will be agreed with senior staff in the organisation in advance. Staff will not smoke or consume alcohol on any CPM Sounds CIC trip.

Health and Safety arrangements require members of staff to keep colleagues aware of their whereabouts, during an out of setting activity. This means staff will always have another adult present in out of setting activities, unless otherwise agreed with senior staff in the organisation.

### **Staff appearance**

Staff must dress smartly, in clothing appropriate to the role, compliant with professional standards and not likely to be viewed as offensive, revealing or sexually provocative. It should not distract, cause embarrassment or give rise to misunderstanding. Political slogans must be avoided.

Any staff with tattoos that might be viewed as offensive, provocative or likely to give rise to misunderstanding must ensure those tattoos always remain covered when that adult is working for the organisation.

### **The acceptable use of technologies**

Staff must not engage in inappropriate use of social network sites which may bring themselves, the setting, organisation community or employer into disrepute. Staff should ensure that they adopt suitably high security settings on any personal profiles they may have.

Staff must be circumspect in their use of **all** social media or any other web based presence that they may have, including written content, videos or photographs, and views expressed directly or by association with websites/pages or posts established by others (eg 'liking', reposting or forwarding). This includes the use of dating websites where staff could encounter parents or learners either with their own profile or acting covertly.

They must consider the long-term implications of any content published by them online, specifically how it might ever have an adverse effect:

- on their reputation as an individual working in an education setting
- their ability to maintain good professional boundaries with parents and with learners
- on the reputation of the organisation.

Staff must not access any content from the internet on personal device during operating hours, onsite, or on a school computer or device at any time that could bring the school into disrepute or that might lead a reasonable person to question the staff member's motivation or intentions.

All staff are aware of their part in ensuring the DFE Filtering and monitoring standards and cyber security standards are upheld. If staff become aware of misuse by another member of staff (in or out of the setting), they must report those concerns using the concerns and allegations against staff (including supply teachers, third-party & self-employed staff, volunteers, contractors) procedures.

### **Exceptional operating circumstances**

If the organisation is required to change the way we offer our provision to children and vulnerable adults due to unforeseen circumstances eg during a pandemic lockdown, staff safeguarding responsibilities to children and vulnerable adults will continue to apply. In line with the safeguarding policy

The DSL will ensure staff, learners, and families are provided with written:

- temporary changes to procedures for working with learners eg online or face-to face offsite.
- timescales for such changes so that all learners, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

### **Photography and recording**

Staff are not permitted to not use their phones, cameras or any device that can be used for photographing or recording learners, when on duty for any purpose. Phones are kept in the designated area. Any pictures taken of learners by the organisation will be in accordance to the Mobile phone and camera / photography and filming published procedures.

Staff will not:

- take images of a learner's injury, bruising or similar (eg following a disclosure of abuse)
- make audio recordings of a learner's disclosure.

### **Whistleblowing**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the organisation's safeguarding regime (or whistleblowing). All staff who wish to raise an issue relating to the organisation with someone in confidence can use the following whistleblowing procedures:

In the first instance, concerns about poor or unsafe practice within must be raised with:  
Tom Mallard (DSL)

Where a staff member feels unable to raise an issue with Tom Mallard or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- A Director: Guy Britton - [guybritton@gmail.com](mailto:guybritton@gmail.com)
- The [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/keeping-children-safe/whistleblowing/) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) if:
  - they think the concern will not be dealt with properly or
  - may be covered up or
  - if they raised a concern but it has not been acted upon or if they are worried they are being treated unfairly.

### **Allegations against staff**

If a member of staff is concerned about the behaviour of a person working or volunteering for the organisation, they will follow the agreed procedure set out in the flowchart 'Allegations and concerns against adults in education settings', displayed in the staff room. See Safeguarding Policy (dec 2025).

## **Training**

All members of staff and volunteers have read and signed to confirm they understand this Staff Behaviour Policy.

### **Induction**

The welfare of all our learners is of paramount importance. All staff including volunteers are informed of this policy at induction and given the chance to question and discuss the expectations set out.

### **Staff support**

Work with children and vulnerable adults is both rewarding and demanding. We support staff by prioritising time to discuss the challenges of their role linked to any aspect of this Staff Behaviour Policy with their line manager and seek further support as appropriate.

## **Monitoring and review**

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance.