Code of Conduct

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BRITISH BOARDING SCHOOLS NETWORK
Approved Agent 2025-2026

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Oxbridge Group Ltd: Code of Conduct

Introduction

This code is presented to Staff, Contractors, Host Families and Volunteers as a supportive document which aims to offer guidance with the safety of staff and pupils in mind. Full reference should be made to relevant handbooks (Staff or Host Family as appropriate) and also to Safeguarding, Data Protection, Safer Recruitment and Complaints Policies.

Oxbridge Group Ltd (Oxbridge Guardians and Aspired Education) have high expectations for the conduct of our Staff, Contactors, Host Families and Volunteers to be in a professional, caring and informed manner. Should any questions be raised through this guidance, please contact the Designated Safeguarding Lead: Steph Gilbert (07837778298) or steph.gilbert@oxbridgeguardians.co.uk

Aims

The Aims of this code are:

- To keep pupils safe.
- To reduce the risk of allegations against Staff, Contractors, Host Families and Volunteers.

Principles

- The welfare of the child is paramount (Children Act 1989)
- Staff, Contractors, Host Families and Volunteers should understand their responsibilities to safeguard and promote the welfare of children and young people.
- Staff, Contractors, Host Families and Volunteers are responsible for their own actions and behaviour and should avoid any conduct which could lead any reasonable person to question their motivation and intentions.
- Staff, Contractors, Host Families and Volunteers should work and be seen to work in an open and transparent way.
- Staff, Contractors, Host Families and Volunteers should behave professionally, treat all children and young people with respect and ensure that their behaviour does not inadvertently lay them open to allegations of abuse.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief or sexual identity.
- Staff, Contractors, Host Families and Volunteers should continually monitor and review their practice to ensure they follow the guidance contained in this code.

Propriety and Behaviour

- Staff, Contractors, Host Families and Volunteers are expected to adopt high standards of

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personal conduct in order to maintain the confidence and respect of all those with whom and for whom they work.

- Staff, Contractors, Host Families and Volunteers have an individual responsibility at all times to ensure appropriate use of company property and resources.
- Staff, Contractors, Host Families and Volunteers should understand the need to act as good role models for children and young people.
- Staff, Contractors, Host Families and Volunteers should understand and be aware that safe practice also involves using judgement and integrity about behaviours outside the work setting. Behaviour in their personal lives may impact on their work with children and young people and the reputation of Oxbridge Group Ltd.
- Staff, Contractors, Host Families and Volunteers' conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties. Illegal drugs are prohibited on site and when hosting any students.
- Consumption of alcohol is not permitted at the company offices except at functions or when otherwise agreed by the Director that modest amounts of alcohol may be consumed. Smoking is not permitted at the company offices.

Homestay contact with Students

- Host families will endeavour to keep physical contact with the student to a minimum.
- Homestay family members may not engage in inappropriate physical contact of any kind with students in their care.
- Use of corporal punishment is not allowed.
- Use of restraint should only be used in highly exceptional circumstances (for the safety of the child – any questions please raise them with the Designated Safeguarding Lead)
- Under no circumstances may a Homestay or member of their family give tobacco or drugs to students.
- Alcohol may only be given to students, in moderation, at times specified by parents or guardians and in accordance with the law restricting the sale, supply and consumption of alcohol.
- Host families should prudently avoid situations in which they are alone with students in rooms or areas which are locked or made inaccessible to others.
- Student's bedroom must always be regarded as private space and Staff or Host families should never visit a student in his or her bedroom or dormitory except when exercising specific responsibilities or duty of care. In this case, doors should be left ajar or another Host Family member made aware of the course of action being followed.

Health and Safety and First Aid

- All Staff, Contractors, Host Families and Volunteers have a duty to ensure that a safe

working environment exists. Fire and evacuation procedures must be adhered to.

- Host families should ensure that they regularly check their home environment for any visible signs of danger.
- Host families are asked to keep a basic first aid kit readily available in the house.
- All Host families should ensure that they have working smoke and carbon monoxide alarms installed and that these are checked regularly.
- Host families are required to provide Oxbridge Group Ltd with a copy of their annual gas safety certificate and to ensure that this check is undertaken routinely.
- Host families are required to check with their household insurer that they are correctly insured whilst hosting students. A copy of the insurance document will be checked during the annual inspection visit from a member of Oxbridge Group Ltd' staff.

Administering Medication

- Staff, Contractors, Host Families and Volunteers should receive appropriate training before administering medication and should, where this is required:
  - explain to the child or young person what is happening
  - always act and be seen to act in the child or young person's best interests.
- Children and young people may need medication during their period of guardianship with Oxbridge Group Ltd. In circumstances where children and young people need medication regularly, a health care plan should be drawn up to ensure the safety and protection of the child or young person and Oxbridge Group Ltd' staff.
- With the permission of parents, children and young people should be encouraged to self-administer medication or treatment including, for example, any ointment, sun cream or use of inhalers.
- If a member of staff, volunteer or Homestay is concerned or uncertain about the amount or type of medication being given to a child/young person, this should be discussed with the Directors at the earliest opportunity.

Transporting pupils

- Any member of staff using their car on behalf of Oxbridge Group Ltd for official business must ensure that they have the appropriate business insurance in place before providing transport to a child or young person.
- Staff or host families providing transport to students should ensure that they read and adhere to Oxbridge Group Ltd' transport policy
- Host families who use their car to provide transport to students should inform their vehicle insurers that they are planning to use their car for this purpose and ensure that suitable cover is in place.
- A copy of the vehicle insurance document will be checked during the annual inspection visit from a member of Oxbridge Group Ltd's staff.

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Accident and Incident Reporting

- It is the responsibility of all Staff, Contractors, Host Families and Volunteers to report accidents and dangerous occurrences immediately.
- These should be reported through the online Accident Form which informs the Accident Book kept by Oxbridge Group Ltd. The Designated Safeguarding Lead should review each entry and report further information of each investigation.
- The number of entries in the Accident Book will be reviewed regularly by the Directors.
- In the case of a serious accident or incident Oxbridge Group Ltd is aware of the need to report it following 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations' (RIDDOR)

Confidentiality

- Members of Staff, Contractors, Host Families and Volunteers may have access to confidential information about children and young people in order to undertake their everyday responsibilities. In some circumstances, they may be given highly sensitive or private information. They should never use confidential or personal information about a young person or her/his family for their own or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate or embarrass the young person.

- This means that Oxbridge Group Ltd' Staff, Contractors, Host Families and Volunteers should:
  - treat information they receive about a child or young person in a discreet and confidential manner;
  - seek advice from a Director or the Designated Safeguarding Lead if they are in any doubt about sharing information they hold or which has been requested from them;
  - be circumspect when passing information to others about a child or young person;
  - know the procedures for handling allegations against members of Oxbridge Group Ltd' staff and know to whom any concerns or allegations should be reported.
- Know the name of those with designated responsibilities for child protection (the Designated Safeguarding Lead: Steph Gilbert 07837778298) and be familiar with safeguarding and child protection arrangements.
- Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the child or young person's identity does not need to be disclosed, the information should be used anonymously.
- There are some circumstances in which a member of Oxbridge Group Ltd's Staff, Contractors, Host Families or Volunteers may be expected to share information about a child or young person, for example when abuse is alleged or suspected.

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- In such cases, individuals have a duty to pass information on without delay, in accordance with the Confidentiality and Information Sharing Policy, but only to those with designated responsibilities for safeguarding and child protection. If in doubt please discuss such cases with the Oxbridge Group Ltd's Designated Safeguarding Lead.

- If a member of Staff, Contractor, Host Family or Volunteer is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a Director of Oxbridge Group Ltd.
- Any media or legal enquiries should be passed to a Director.
- The storing and processing of personal information about young people is governed by the Data Protection Act, 2018. Oxbridge Group Ltd Directors have provided clear advice to Staff, Contractors, Host Families and Volunteers about their responsibilities under this legislation referenced in the following policies:
  - Data Protection Policy
  - Confidentiality and Information Sharing Policy
  - Privacy Policy Policy
  - Employee Privacy Policy
  - Safer Recruitment Policy
- Confidential information about Oxbridge Group Ltd's Staff, Contractors, Host Families and Volunteers should never be used casually in conversation or shared with any person other than on a need-to-know basis.

Criminal Offences (see also Safer Recruitment Policy)

- All Oxbridge Group Ltd's Staff, Contractors, Host Families and Volunteers must inform a Director immediately if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution. Oxbridge Group Ltd's Directors will discuss this with the member of Staff, Contractor, Host Family or Volunteer in the context of their role and responsibilities in order to safeguard the children or young people in the care of Oxbridge Group Ltd and other members of Oxbridge Group Ltd staff.
- Where a member of Oxbridge Group Ltd Staff, Contractor, Host Family or Volunteer is found guilty of a criminal offence that involves violence or possession or use of illegal drugs or sexual misconduct, they will be dismissed as these behaviours are considered unacceptable

Use of Technology and Electronic Communications

- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers must exercise caution when using information technology and be aware of the potential risks to themselves and others in accordance with given information on the e-safety policy and guidelines given for internet use.
- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers should not befriend children or young people or their family members on social networking sites and should

exercise caution when communicating with children or young people who have subsequently left the care of Oxbridge Group Ltd. For the purposes of this policy, the Directors can authorise the use of WeChat by regulated members of staff, subject to appropriate training and a record noted on the SCR.

- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers must not engage in inappropriate use of social network sites which may bring themselves or Oxbridge Group Ltd into disrepute.
- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers should not establish or seek to establish social contact with children or young people for the purpose of securing a friendship or to pursue or strengthen a relationship.
- If a young person or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff, volunteer or Homestay should inform the Directors and exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued as grooming (see the Safeguarding and Child Protection Policy).

It is recognised that Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers can support a parent who may be in particular difficulty. Care needs to be exercised in those situations where the parent comes to depend upon the colleague for support outside their professional role. This situation should be discussed with Oxbridge Group Ltd Directors who will agree any necessary actions and follow up with the Oxbridge Group Ltd Staff, Contractor, Host Family or Volunteer raising such a concern.

- This means that Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers should:
  - exercise caution when using information technology;
  - always seek approval for any planned social contact with children or young people or parents with the Directors;
  - advise Oxbridge Group Ltd's Directors of any social contact they have with a child or young person which may give rise to concern;
  - report and record any situation which they feel might compromise Oxbridge Group Ltd or their own professional standing;
  - refrain from sending personal communication to young people e.g. letters and cards unless agreed in advance with the Directors. Oxbridge Group Ltd's Directors are happy to forward any letters or cards to past students on behalf of Staff, Contractors, Host Families and Volunteers.
- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers should be aware of the potential dangers of social networking sites such as Facebook, Instagram and Twitter where a member of staff's private life or personal feelings could be freely available for all to read and could therefore compromise their professional status.
- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers should keep social networking profiles private and refrain from joining groups that are directly linked to students under the care of Oxbridge Group Ltd.
- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers should ensure that any photographs posted on personal social media sites could not lead to any professional or

personal embarrassment.

- Oxbridge Group Ltd Staff, Contractors, Host Families and Volunteers are strongly encouraged to ensure that they carefully monitor their personal social media sites and regularly check their security settings to help negate any possible problems arising.

Physical Contact

- There are occasions when it is entirely appropriate and proper for Staff, Contractors, Host Families and Volunteers to have physical contact with children or young people but it is crucial that they only do so in ways appropriate to their professional role.

- This means that Staff, Contractors, Host Families and Volunteers should:
  - be aware that even well intentioned physical contact may be misconstrued by a child or young person, an observer or by anyone to whom this action is described;
  - never touch a young person in a way which may be considered indecent; always be prepared to explain actions and accept that all physical contact will be open to scrutiny;
  - never indulge in horseplay, tickling or fun fights;
  - always encourage the children or young people, where possible, to undertake self-care tasks independently.
  - Use of corporal punishment is not allowed.
  - Use of restraint should only be used in highly exceptional circumstances (for the safety of the child – any questions please raise them with the Designated Safeguarding Lead)
  - In the case that a student, or the student's belongings are required to be searched, Oxbridge Group Ltd suggest strongly that Host Families/Schools/Staff endeavour to have another person present, to ensure that the response is professionally and appropriate to the situation. Where possible, permission should be gained from parents in advance of any student search, to ensure that there is clear communication about the situation and resulting search.
- A 'no touch' approach is often impractical for Staff, Contractors, Host Families and Volunteers and will in some circumstances be inappropriate. When physical contact is made with children or young people, this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child or young person in one set of circumstances may be inappropriate in another, or with a different child/young person. Staff, Contractors, Host Families and Volunteers should, therefore, use their professional judgement at all times.
- Physical contact with a child or young person should never be secretive, for the gratification of the adult or represent a misuse of authority. If a member of staff, volunteer or Homestay believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible to one of the Directors by means of a 'cause for concern' report and, if appropriate, a copy placed on the child or young person's file.

- Physical contact which occurs regularly with an individual child or young person is likely to raise questions unless the justification for this is part of a formally agreed plan, for example in relation to children or young people with a physical disability. Any such contact should be the subject of an agreed and open care plan and subject to review. Staff, Contractors, Host Families and Volunteers should always seek the child or young person's permission before initiating contact. Staff, Contractors, Host Families and Volunteers should listen, observe and take note of the child or young person's reaction or feelings and - so far as is possible - use a level of contact and/or form of communication which is acceptable to the child or young person for the minimum time necessary.

- Extra caution may be required where it is known that a child or young person has suffered previous abuse or neglect. In the child or young person's view, physical contact might be associated with such experiences and lead Staff, Contractors, Host Families and Volunteers to being vulnerable to allegations of further abuse. It is recognised that many such children or young people may seek out inappropriate physical contact. In such circumstances, Staff, Contractors, Host Families and Volunteers should deter the child sensitively by helping them to understand the importance of personal boundaries and seek further advice and guidance from the Designated Safeguarding Lead or the Directors.
- The general principle of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child or young person. Children and young people with special needs/disabilities may require more physical contact to assist with aspects of their everyday lives. The arrangements should be understood and agreed by all concerned, justified in terms of the child/young person's needs, consistently applied and open to scrutiny. Where a member of staff, volunteer or Homestay has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from the Directors. Directors will then consult relevant stakeholders to determine an appropriate written care plan.

Children or Young People in Distress

- There may be occasions when a distressed child or young person needs comfort and reassurance. This may include age-appropriate physical contact. Staff, Contractors, Host Families and Volunteers should remain self-aware at all times in order that their contact is not threatening in any way.
- This means that Staff, Contractors, Host Families and Volunteers should:
  - consider the way in which they offer comfort to a distressed young person;
  - always tell a colleague when and how they offered comfort to a distressed child or young person;
  - record situations which may give rise to concern. 'Cause for Concern' report is available online for all Staff, Host families and Volunteers to access. These reports will be sent to the Designated Safeguarding Lead.

Use of Bathrooms

- Children and young people are entitled to respect and privacy when changing clothes or taking a shower/bath. However, there needs to be an appropriate level of supervision in order to safeguard children and young people and to satisfy health and safety considerations. Such supervision should be appropriate to the needs and ages of the children or young people concerned and sensitive to the potential for embarrassment.
- This means that Oxbridge Group Ltd staff should:
  - avoid any physical contact when children or young people are in a state of undress;
  - avoid any visually intrusive behaviour;
  - in bathrooms shared with family members, announce their intention of entering;
  - fit all bathrooms with a lock;
  - avoid remaining in the room unless the child or young person's needs require it;
  - not shower or bathe with a child or young person.

Language

- Staff, Contractors, Host Families and Volunteers should not swear, blaspheme or use offensive language in front of children and young people.
  - Staff, Contractors, Host Families and Volunteers should not use language which is discriminatory and demeaning in relation to gender, religion, ethnicity, sexual orientation, disability or age.
- Staff, Contractors, Host Families and Volunteers should not make sexual innuendos or any comments of a sexual nature, nor make any comments trivialising alcohol or drug abuse.
- The use of sarcastic, demeaning or insensitive comments towards young people can also be regarded as a form of abuse which is potentially very damaging and must be avoided.

Gifts, Rewards and Favours

- Staff, Contractors, Host Families and Volunteers 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.
- Staff, Contractors, Host Families and Volunteers should not give presents to individual children or young people without first notifying the Directors.
- Staff, Contractors, Host Families and Volunteers should take care to ensure they do not accept any gift that might be construed as a bribe or lead the giver to expect preferential treatment.
- It is unacceptable to receive gifts on a regular basis or of any significant value.

Relationships

- Staff, Contractors, Host Families and Volunteers should understand that they are in a position of trust in relation to children and young people, giving them influence and power by virtue of the knowledge they have and/or the authority invested in their role.
- Staff, Contractors, Host Families and Volunteers should ensure that their relationships with children and young people clearly take place within the boundaries of a respectful professional relationship and avoid behaviour which might be misinterpreted by others.
- Staff, Contractors, Host Families and Volunteers should maintain an 'arms length' approach to social contact with children and young people so as to ensure the professional relationship is maintained and that boundaries are not blurred for the young person. In this way, we strongly recommend that meeting outside of a formal working context is refrained from, along with social situations which are not appropriate to the working relationship avoided.
- Staff, Contractors, Host Families and Volunteers should only communicate with students in a professional manner which is reflective of the duty of care to the young people in our Guardianship. Social media usage should be as detailed in the Code of Conduct, Host Family Handbook and Staff Handbook, and Staff, Contractors, Host Families and Volunteers should act with the best interest of the child and the principles of Oxbridge Group Ltd and our Safeguarding policy in mind at all times.
- A relationship between an adult and a child or young person is not a relationship between equals and there is a potential for exploitation and harm of vulnerable young people.
- Staff, Contractors, Host Families and Volunteers have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Infatuations

- Occasionally, children or young people may develop an infatuation for a member of Staff, Contractor, Host Family. In such situations the advice of the Directors must be sought.
- Staff, Contractors, Host Families and Volunteers 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.
- Other members of Staff, Contractors, Host Families and Volunteers have a part to play in alerting a colleague to the possibility of an infatuation in order that appropriate steps can be taken to minimise hurt and distress and the risk to the member of staff, volunteer or Homestay concerned.
- Staff, Contractors, Host Families and Volunteers have a responsibility to report a 'cause for concern' about the situation, either in regard to themselves or a colleague immediately in such circumstances.

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Sexual Contact

- Staff, Contractors, Host Families and Volunteers should not have any form of communication with a pupil which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, texts, emails or physical contact.
- Staff, Contractors, Host Families and Volunteers should not make sexual remarks to, or about a child or young person, discuss their own sexual relationships with or in the presence of children or young people or have sexual relationships with any young person in their care. It is an offence for an adult to engage in sexual activity with or in the presence of a child or young person in their care or to cause or incite that child or young person to engage in or watch sexual activity.
- Any sexual activity between a member of staff, volunteer or Homestay and a pupil may be regarded as a criminal offence and will always be a matter for referral to the Police and Local Authority Designated Officer.