



CODE OF CONDUCT & ETHICS

2026-2027

Group Policy Document

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1.0 INTRODUCTION

1.1 This policy applies to all employees, volunteers, contractors, and any other individuals working on behalf of ARK Inclusive Education.

1.2 This policy and procedure recognises that the welfare of our children, young people, and families is paramount. All those working with them must set an appropriate example and act as positive role models at all times.

1.3 This policy must be read by all colleagues alongside the following ARK Inclusive Education policies:

- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Complaints Policy
- Anti-Bullying Policy
- Equality, Diversity and Inclusion Policy
- Disciplinary Policy and Procedure
- Data Protection Policy

2.0 DEFINITIONS

Word/Term	Descriptor
Welfare	The health, happiness, safety, and well-being of a child, young person, family member, or colleague.
Ethical Principles	Individuals must always treat children, young people, and adults in our care fairly and with respect. Language used must always be appropriate and communicated in a way that is understood by the individual. Swearing, shouting, or using derogatory language is never permitted. Where appropriate, alternative communication methods (e.g., visual supports, Makaton, AAC) should be used as set out in individual plans.
Safeguarding	All colleagues working with our children and young people must take all reasonable measures to ensure that the risks of harm to their welfare are minimised. Where there are concerns about a child or young person's welfare, all those representing ARK Inclusive Education must take appropriate actions to address those concerns in line with our Safeguarding Policy.
Neurodivergence	A term used to describe variations in the human brain and cognition, including Autism, ADHD, Dyslexia, and PDA. ARK Inclusive Education is a neurodivergence-affirming provision.
Trauma-Informed Practice	An approach that recognises the impact of trauma on individuals and seeks to create a safe, supportive environment that promotes healing and resilience.

3.0 PURPOSE

3.1 The purpose of this policy is to ensure that any management action taken is fair and consistent and in line with ARK Inclusive Education's policies and practices. The policy, procedures, and processes identified within this document apply to all colleagues irrespective of age, ethnicity, gender, marital or civil partnership status, nationality, offending history, race, disability, religion or belief, sexual orientation, social status, trade union membership, or working patterns.

3.2 This policy cannot provide a complete checklist of what is, or is not, appropriate behaviour. It does, however, highlight behaviour which is illegal, inappropriate, or inadvisable. There may be rare occasions and circumstances in which colleagues have to make decisions or take action in the best interest of a

child, young person, or vulnerable adult which could contravene this guidance or where no guidance exists. Individuals are expected to make professional judgements about their behaviour to secure the best interests and welfare of the children and young people in their charge and, in so doing, will be seen to be acting reasonably. These judgements should always be recorded and shared with a manager.

4.0 RESPONSIBILITIES

4.1 All Colleagues must:

- Care for and safeguard our children and young people, delivering the ARK Inclusive Education promise.
- Complete any mandatory training and/or qualifications required by the provision.
- Promote the welfare of children and young people and provide a safe, nurturing environment, protecting them from neglect, physical, sexual, and emotional abuse.
- Report any concerns regarding our children and young people as soon as possible to the Designated Safeguarding Lead (DSL) or equivalent. Failure to do so could result in disciplinary action.
- Ensure they have read, understood, and comply with:
 - The ARK Inclusive Education Safeguarding Policy and local procedures.
 - Keeping Children Safe in Education (KCSIE) statutory guidance.
 - Guidance for Safer Working Practice for those working with Children and Young People in Education Settings.

4.2 Line Managers must:

- Ensure they comply with all statutory guidance, minimum standards, and legislation relevant to the service.
- Ensure their team members are aware of and understand this policy and any future revisions.
- Model the highest standards of professional behaviour.

5.0 STANDARDS OF PRACTICE AND ACCOUNTABILITY

5.1 Colleagues must always treat our children, young people, and their families fairly and with respect. The language used must always be appropriate and communicated in a way that is understood. Swearing, shouting, or using derogatory language is not permitted at any time.

5.2 Colleagues' actions in off-duty hours must not compromise the values or the reputation of ARK Inclusive Education or their ability to work safely with children and young people.

5.3 All colleagues have a responsibility to maintain public confidence in their ability to safeguard our children and young people. All colleagues are expected to conduct themselves in a professional

manner whilst at work. This extends to home working, virtual learning, or remote sessions, where colleagues are expected to ensure that their working conditions, surroundings, and dress code are appropriate for their professional role.

5.4 This document should be read in conjunction with:

- *'Guidance for Safer Working Practice for those working with Children and Young People in Education Settings'*
- *'Keeping Children Safe in Education (KCSIE)'*
- And any other relevant guidance as instructed.

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

6.0 SAFEGUARDING CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS

6.1 General Principles

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

6.2 Open and Transparent Culture

ARK Inclusive Education is committed to creating an open and transparent culture, which allows colleagues to raise concerns even if this is in regard to a fellow colleague (see Whistleblowing Policy).

6.3 Disclosure of Personal Circumstances

ARK Inclusive Education takes its responsibility to safeguard children and young people seriously and expects colleagues to notify their line manager if somebody with whom they hold a personal relationship (including online or living with) is under investigation by a statutory agency or is cautioned or convicted of an offence against a child, young person, or vulnerable adult. This should also include domestic violence when a child or young person may have been affected or at risk.

6.4 Position of Trust

The relationship between a colleague and our children and young people is one in which the colleague has a position of power or influence. It is vital for our colleagues to understand this power. The potential for exploitation and harm of vulnerable people means that our colleagues have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

6.5 Professional Boundaries

Colleagues are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. Colleagues need to recognise that it is not uncommon for children and young people to develop a "crush" or infatuation with them. Colleagues should make every effort to ensure that their own behaviour cannot be brought into question. The senior manager should give careful thought to those circumstances and take appropriate action to safeguard both the child/young person and the colleague.

6.6 Physical Contact

Colleagues should be aware that even well-intentioned physical contact may be misinterpreted by the child/young person, an observer, or any person to whom this action is described. Colleagues should:

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

6.7 Behaviour Management

When colleagues are dealing with behaviour management with our children and young people, colleagues should:

- Follow the provision's Behaviour Policy.
- Not use force as a form of punishment.
- Always try to defuse situations before they escalate (e.g., by using de-escalation techniques, distraction, or offering choices).
- Always show empathy towards children and young people, particularly following a physical intervention when they may be upset or hurt.

- Keep parents or carers informed of any sanctions or behaviour management techniques used.
- Be mindful of and sensitive to factors both inside and outside of the setting which may impact on a child/young person's behaviour (including trauma, sensory needs, and communication difficulties).
- Avoid shouting at children and young people other than as a warning in an emergency/safety situation.
- Refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI).
- Be aware of the legislation and potential risks associated with the use of isolation and seclusion.
- Comply with legislation and guidance in relation to human rights and restriction of liberty.

6.8 One-to-One Situations

When colleagues are working in a one-to-one situation with a child or young person, they should:

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

6.9 Transporting and Home Visits

When colleagues are transporting children/young people and conducting home visits, they should:

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

6.10 Duty to Disclose

All colleagues of ARK Inclusive Education have a duty to disclose any change in their circumstances or any information which may affect or is likely to affect the suitability of the colleague to undertake their job role or work with our children and young people. This includes changes to health, criminal convictions, or any other relevant matter.

6.11 Smoking and Substance Use

- Smoking (including vaping) is not permitted on any of our premises or during working hours.
- Colleagues must not attend work under the influence of drugs or alcohol under any circumstances.
- Colleagues must not bring drugs or alcohol onto any ARK Inclusive Education premises.

6.12 Use of Personal Devices

- Colleagues are not permitted to make or receive personal calls, texts, emails, or access the internet for personal use during work time where children and young people are present.
- Personal mobile phones should be stored securely during working hours.
- Colleagues must never use their personal equipment to take photos or make recordings of those in our care.
- Company emails, documents, and browsing history are monitored in accordance with data protection and privacy legislation. Any concerns regarding unauthorised, unacceptable, or inappropriate use will be investigated in line with our Disciplinary Policy.

6.13 Recruitment and Promotion

A colleague must never be involved in a recruitment process or promotion decision where one of the applicants is a relative, partner, or close friend.

7.0 STANDARDS OF CONDUCT

7.1 Legal Compliance

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

7.2 Gifts and Hospitality

Colleagues should not accept any gifts, entertainment, or personal favours which may be believed to have any influence on business or professional judgement. Any offers of gifts or hospitality should be recorded and reported to a line manager in line with our Gifts and Hospitality Policy.

7.3 Use of Funds

ARK Inclusive Education funds will not be used without Director consent for unlawful or improper purposes.

7.4 Respect and Dignity

All colleagues should be treated with respect and dignity and should work in an environment free from verbal, physical, and sexual harassment. We value the individual diversity and creative potential every colleague brings to our organisation.

7.5 Fair Recruitment and Promotion

Judgements about colleagues for the purpose of recruitment, development, or promotion shall be made solely on the basis of the colleague's ability, behaviour, and work performance.

7.6 Confidentiality

If a colleague leaves their employment with ARK Inclusive Education, it is still their duty to maintain confidentiality regarding children, young people, families, and the organisation once they have left.

7.7 Public Statements

Colleagues should not take public positions on behalf of ARK Inclusive Education without first obtaining permission from the Director.

7.8 Conflicts of Interest

Colleagues should avoid conflicts of interest within the organisation in which their personal, family, or financial interests may conflict with the organisation. Where a potential conflict of interest may arise, the colleague must declare that interest in writing to the Director. Examples of conflicts to be declared include:

- Recruiting a family member, including extended family members, relatives, and friends, in any capacity.
- Having an interest, directly or indirectly or through family, in a competitor, supplier, or customer of ARK Inclusive Education.
- Acquiring an interest in property (such as real estate, patent rights, or securities) where the organisation has, or might have, an interest.

8.0 PROPERTY AND RESOURCES

8.1 Information generated within the organisation, including research, development, data, costs, prices, sales, profits, markets, customers, and methods of doing business, is the property of ARK Inclusive Education and must not, unless legally required, be disclosed outside the organisation without prior authority from the Director.

8.2 Resources include assets such as materials, equipment, and cash, but also assets such as computer systems, trade secrets, and confidential information. Colleagues must observe the guidelines concerning the classifying and handling of documents and electronic data. The storage of personal data is governed by laws with which relevant colleagues should familiarise themselves (see Data Protection Policy).

9.0 POLICIES, DELEGATED AUTHORITIES AND RESERVED POWERS

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

10.0 FINANCIAL AND OTHER RECORDS, DISCLOSURES AND COMMUNICATIONS

10.1 All colleagues are required to keep accounts and any other records which give a view of financial position, results of operations, transactions, and assets up to date and accurate. Records should be kept in accordance with organisational policies and relevant accounting standards.

10.2 Colleagues must ensure that all reports published, filed, or submitted to stakeholders or regulators are full, fair, accurate, timely, and understandable. They must not mislead the reader or omit anything necessary to make them full, fair, and accurate.

11.0 PROCEDURES FOR RAISING INTEGRITY CONCERNS

11.1 A colleague having a direct or indirect financial interest in any item of business of ARK Inclusive Education shall disclose the fact to their manager and shall not take part in any item of business in which they have a financial interest. If the manager is not appropriate, please contact the Director.

11.2 Any colleague who has a concern about any aspect of conduct, practice, or ethics should refer to our Whistleblowing Policy and Safeguarding Policy for guidance on how to raise their concern.

12.0 PERSONAL INTEREST

All colleagues must declare any personal interests that could potentially conflict with their professional duties. This includes, but is not limited to:

- Financial interests in any organisation that competes with or does business with ARK Inclusive Education.
- Family or personal relationships that could influence decision-making.
- Any other matter that could reasonably be perceived as a conflict of interest.

Declarations should be made in writing to the Director and reviewed annually.

13.0 MONITORING AND REVIEW

13.1 This policy will be reviewed annually by the Director to ensure it remains fit for purpose and compliant with current legislation and best practice guidance.

13.2 All colleagues will be required to confirm annually that they have read, understood, and will comply with this Code of Conduct.

13.3 Any breaches of this policy will be investigated in line with the Disciplinary Policy and may result in disciplinary action, up to and including dismissal.

End of Policy Document