

# Thames Hightech Ltd

## Staff and Homestay Code of Conduct 2025/26

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*Registered address: Hurlingham Studio, Ranelagh Gardens, London SW6 3PA*

*Applies to: staff, volunteers, contracted staff, local coordinators, homestays and relevant adult household members where applicable*

This Code of Conduct sets out the professional standards and behaviour expected of all staff, contracted personnel, volunteers and homestays working with or on behalf of Thames Hightech Ltd.

Its purpose is to protect students, support adults to maintain safe and professional boundaries, reduce the risk of misunderstandings or false allegations, and promote a consistent safeguarding culture.

This document should be read alongside the Safeguarding and Child Protection Policy, Low Level Concerns Policy, Whistleblowing Policy, Online Safety Policy, Missing Student Procedure, Safer Recruitment Policy and relevant contracts and handbooks.

### 1. Core principles

- The welfare of the child is paramount.
- Adults working with students hold a position of trust and must never misuse that position.
- All adults must act professionally, fairly, respectfully and consistently.
- All adults must maintain clear professional boundaries with students and their families.
- All adults must report safeguarding concerns, allegations and low level concerns promptly in line with organisational policy.

### 2. Equality, dignity and respect

Students must be treated with dignity and respect at all times, regardless of age, sex, disability, race, culture, religion or belief, language, nationality, sexual orientation or family background. Adults must avoid favouritism, humiliation, sarcasm, intimidation, discriminatory conduct or any behaviour that undermines a student's wellbeing.

### 3. Professional boundaries

- Relationships with students must remain professional at all times.
- Adults must not behave as a student's friend, peer or confidant in a way that blurs safeguarding boundaries.
- Adults must not initiate or encourage secretive relationships, special arrangements or exclusive treatment.
- Contact with parents, agents and school staff must also remain professional and appropriate.

### 4. Use of language and behaviour

- Adults must use calm, polite and appropriate language.
- Swearing, shouting, humiliating comments, sexualised language, sarcasm directed at a child, discriminatory remarks or threatening language are unacceptable.
- Adults must not use inappropriate jokes, teasing or behaviour that could be interpreted as bullying, grooming or intimidation.

## 5. Sexual conduct and inappropriate relationships

Any sexual behaviour, whether contact or non-contact, towards or involving a student is strictly prohibited and is likely to be treated as a safeguarding matter, disciplinary matter and potentially a criminal matter. Grooming behaviour, flirtatious behaviour, sexualised comments, requesting or sharing intimate images, or discussing sexual matters in an inappropriate way are all prohibited.

## 6. Communication with students

- Communication with students must be professional, necessary and proportionate.
- Where possible, communication should take place through approved organisational channels or contact details.
- Adults must not use secret, private or disappearing-message channels to communicate with students.
- Communication should normally be limited to welfare, travel, accommodation, education or other legitimate support matters.
- Any significant welfare-related communication should be capable of being evidenced or recorded if required.

## 7. Social media and online contact

- Adults must not befriend, follow or privately connect with students on personal social media accounts.
- Adults must not share personal usernames, private numbers or private profiles with students.
- Adults should avoid unnecessary social media contact with parents, agents or school staff where this could blur professional boundaries, unless there was a pre-existing personal relationship.
- Any concerning online behaviour, online contact or online disclosure involving a student must be reported in line with safeguarding procedures.

## 8. Physical contact

Physical contact with students should be avoided unless there is a clear, appropriate and justifiable reason related to safety, first aid, immediate welfare need or lawful supervision. Any physical contact must be the minimum necessary, suitable to the situation, age-appropriate and capable of explanation. Corporal punishment is never permitted.

- Adults must not initiate unnecessary physical contact.
- Comfort should normally be provided through calm words, presence and reassurance rather than touch.
- If an unavoidable incident of physical contact occurs, it may need to be reported and recorded.

## 9. One-to-one situations

- Staff meetings with students should wherever possible take place in open or visible environments, or in settings where another adult is nearby.
- Homestays and family members should avoid entering a student's bedroom unless necessary for safety, maintenance or agreed practical reasons.
- Adults must not invite students into adult bedrooms or other inappropriate private spaces.
- If a one-to-one situation is unavoidable, the adult should act transparently and in a way that could withstand scrutiny.

## 10. Privacy and dignity

- Students are entitled to privacy, dignity and personal space.
- Bedrooms, bathrooms and changing arrangements must respect privacy and safeguarding needs.

- Adults must not read private correspondence, inspect devices or interfere with personal belongings unless there is a clear safeguarding, safety or legal reason and the appropriate procedure is followed.

## 11. Photography, video and images

- Images or recordings of students must only be taken for legitimate purposes and in line with parental consent and organisational procedures.
- Adults must not take or retain images of students on personal devices unless explicitly authorised and justified.
- Images must never be taken in situations that could be intrusive, embarrassing or misinterpreted.

## 12. Gifts, rewards and money

- Adults must not give students money, expensive gifts or repeated personal gifts.
- Small, proportionate and transparent tokens may occasionally be acceptable if consistent with organisational practice and not linked to favouritism.
- Adults must not borrow money from students or ask students to purchase goods or services on their behalf.
- Any management of student funds must be authorised and properly recorded.

## 13. Transporting students

- Only approved and appropriately checked transport arrangements may be used.
- Vehicles used to transport students must be roadworthy, insured, taxed and compliant with legal requirements.
- Students should normally sit in the back seat and wear seatbelts. Booster seats must be used where legally required.
- Journey arrangements should be known in advance and capable of being recorded where appropriate.

## 14. Homestay-specific responsibilities

- Homestays are expected to act in loco parentis and provide day-to-day care in a safe, respectful and suitable home environment.
- Homestays must follow the Homestay Handbook, accommodation standards, supervision expectations and permissions set by Thames Hightech Ltd and parents.
- Homestays must not leave students unsupervised inappropriately for their age, maturity or circumstances.
- Homestays must notify Thames Hightech Ltd promptly of any significant concern, incident, illness, behavioural issue, accident, household change or safeguarding matter.

## 15. Student discipline and behaviour

- Adults may set clear, reasonable boundaries and house expectations, but must do so calmly, lawfully and without humiliation.
- Corporal punishment, degrading treatment, intimidation, threats or collective punishments are prohibited.
- Significant sanctions or behavioural concerns must be discussed with Thames Hightech Ltd and, where relevant, parents and the school.

## 16. Searching students or belongings

Searching a student or belongings is a sensitive matter and should only take place where justified by safety or safeguarding concerns and in line with organisational procedures. Intimate searches must never be carried out by staff or homestays. Where possible, Thames Hightech Ltd should be contacted before a search is conducted unless delay would create an immediate risk.

## 17. Safeguarding concerns, allegations and low level concerns

- All safeguarding concerns about a student must be reported promptly to the DSL.
- Any allegation or concern about the behaviour of an adult working with children must be reported immediately in line with the Safeguarding and Child Protection Policy.
- Low level concerns, however small, must also be reported in line with the Low Level Concerns Policy.
- Adults must not attempt to investigate safeguarding allegations themselves.

## 18. Whistleblowing

Any adult who is concerned that poor practice, unsafe behaviour or wrongdoing is occurring must raise it promptly. Thames Hightech Ltd expects concerns to be raised honestly and in good faith in line with the Whistleblowing Policy. No adult should suffer detriment for making a genuine safeguarding-related disclosure.

## 19. Alcohol, drugs, smoking and vaping

- Adults must never permit or encourage illegal, unsafe or inappropriate use of alcohol, tobacco, vaping products or drugs by students.
- Smoking or vaping around students is inappropriate and must be managed in line with homestay expectations and disclosed household information.
- Students must not be exposed to substance misuse, illegal activity or unsafe adult behaviour.

## 20. Confidentiality and information sharing

- Information about students must be treated confidentially and only shared on a need-to-know basis.
- Adults must not promise absolute confidentiality to a student where safeguarding is involved.
- Safeguarding concerns must be shared appropriately with the DSL and relevant agencies in line with policy.

## 21. Breaches of this Code

Failure to follow this Code may result in management action, removal from duties, termination of contract or placement, referral to external agencies, or disciplinary action, depending on the seriousness of the matter.

## 22. Review

This Code of Conduct will be reviewed at least annually and sooner if guidance, legislation, AEGIS standards or organisational practice changes.

Version	2025/26
Approved by	Yuhong Li, Director / DSL
Effective date	1 September 2025
Review date	1 September 2026
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