



New Way Tuition

# Code of Conduct

**Written by:** Managing Director, Mandy Ward on 6<sup>th</sup> January 2025

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## Statement of Intent

At New Way Tuition, we are committed to fostering a safe, respectful, and supportive environment for both pupils and staff. This Staff Code of Conduct outlines our commitment to high standards of professionalism, ethical integrity, and consistent conduct, ensuring that all members of the New Way Tuition community can thrive. Our staff members are dedicated to safeguarding pupils, particularly recognising the unique social, emotional, and behavioural needs within our cohort. For further information please also refer to the **Social, Emotional, and Mental Health (SEMH) policy**. Our role is to provide reliable, positive role models who exemplify respect, care, and accountability, cultivating a nurturing space where pupils feel safe and valued.

## Purpose of this Code of Conduct

1. **To Protect Pupils:** The primary aim of this **Code of Conduct** is to ensure that all pupils in our care are safeguarded against physical, emotional, and psychological harm. Staff are expected to uphold policies that promote the well-being, safety, and best interests of each pupil.
2. **To Set Clear Standards for Staff:** This Code provides comprehensive guidelines to help staff understand and meet the expectations of their roles, ensuring they are supported in carrying out their duties with integrity and without risk to their professional standing.
3. **To Promote Consistency:** By establishing clear policies and procedures, *New Way Tuition* seeks to maintain consistent standards of behaviour and conduct across all areas of our organisation. This consistency enhances our learning environment and builds trust within our community.

## Key Areas of Focus

In line with our intent, all staff are required to:

- **Adhere to Key Policies:** Staff must be familiar with and comply with *New Way Tuition's* safeguarding and welfare policies, see list below in the guidelines section.
- **Act as Positive Role Models:** Staff are expected to model behaviours that reflect respect, professionalism, and commitment to pupil welfare. This is particularly vital in interactions with vulnerable pupils and when representing *New Way Tuition* in the community.
- **Maintain Professional Boundaries:** All staff members must uphold appropriate boundaries in their interactions with pupils, ensuring all conduct is professional, transparent, and respectful of each pupil's individual needs.
- **Respect Confidentiality and Data Protection:** Staff will adhere to GDPR regulations, ensuring that all personal and sensitive data is protected and handled responsibly, in alignment with the Data Protection and Confidentiality guidelines.
- **Demonstrate Ethical Integrity:** Staff will avoid conflicts of interest and will uphold financial transparency, especially regarding inducements, to maintain the trust and confidence of pupils, families, and the wider community.

## Guidelines

All staff are required to read, understand, and adhere to the following *New Way Tuition* policies, with particular attention to those concerning safeguarding and pupil welfare:

### **Safeguarding Policies:**

- Child Protection and Safeguarding Policy
- Health & Safety Policy
- E-Safety Policy
- Complaints Procedures Policy
- Continuous Professional Development policy.
- Safer Recruitment Policy
- SEND policy
- Whistleblowing Policy
- Behaviour Policy
- Bring Your Own Device Policy
- Safer Recruitment Policy
- Lone Working Policy
- KCSIE A
- KCSIE B
- Company Policy
- GDPR Policy
- Disciplinary Policy
- Media Consent Policy
- Prevent Policy

### **Welfare and Behavioural Support Policies:**

- Use of Reasonable Force Policy
- Anti-Bullying Policy
- Attendance Policy
- Staff Equality, Equity Diversity and Inclusion Policy
- Drugs & Substance Misuse Policy
- Relationships and Health Education Policy
- Social, Emotional and Mental Health Policy
- Training and Continuous Professional Development Policy

## Commitment to Continuous Review

This Staff Code of Conduct is reviewed annually to reflect the evolving needs of our pupils and to maintain high standards of professionalism within *New Way Tuition*. Staff will receive a staff handbook and *New Way Tuition's* policies and procedures as part of their induction. All

policies are updated in line with any new legislation and through reflective practice and shared with staff. All policies are reviewed annually and welcome staffs' contributions.

## Conclusion

*New Way Tuition* is committed to creating an educational environment where pupils feel secure, respected, and empowered to achieve their full potential. This Staff Code of Conduct is a testament to our dedication to these principles, ensuring that every interaction within *New Way Tuition* serves the best interests of our pupils and community.

## Rationale

All staff at *New Way Tuition* have a duty to ensure the safety and well-being of pupils, protecting them from both physical and emotional harm while maintaining their own personal safety. Pupils working with *New Way Tuition* often have significant social, emotional, and behavioural needs, including a limited trust in adults. Their families may also have complex relationships with educational or external agencies. This requires staff to uphold an additional level of responsibility due to the vulnerabilities of these young people. As such, staff must always act as positive role models, demonstrating respect toward pupils and colleagues alike. It is essential to behave in a manner that reflects our commitment to safeguarding, ensuring no one could question our suitability to work with children. For further information please also refer to the Social, Emotional and Mental Health Policy.

## Aims

- To always ensure the safety and well-being of pupils.
- To establish clear expectations for staff, protecting them from risk while working at *New Way Tuition*.
- To promote consistency in behaviour and professional conduct across the organisation.

Each of these policies guides staff in maintaining a safe, supportive, and respectful environment for pupils and staff, ensuring a consistent standard of professional behaviour across the organisation.

## Safeguarding Pupils

### Responsibilities of Staff

In accordance with the Keeping Children Safe in Education (KCSIE) 2021 guidelines, all staff members at *New Way Tuition* have a fundamental responsibility to safeguard pupils and protect their welfare.

## Safe Learning Environment

All staff must create a learning environment where pupils feel safe, secure, and respected.

### Adherence to Policies

To effectively safeguard pupils, staff are required to follow the procedures outlined in this Staff Code of Conduct and the Child Protection and Safeguarding Policy. Staff must avoid any actions that could jeopardise pupils' safety or lead to questioning of their conduct.

## Types of Abuse and Neglect

In accordance with the organisations Child Protection and Safeguarding Policy staff should be prepared to identify pupils who may be experiencing or at risk of the following forms of abuse and neglect:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child on Child
- Serious violence
- Female Genital Mutilation (FGM)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (in child protection and Safeguarding policy)

## Increased Risk Factors

Staff should also be aware that certain factors may elevate a pupil's risk of encountering safeguarding issues, including:

- Pupils needing a social worker (under Child in Need or Child Protection Plans)
- Pupils requiring mental health support
- Looked After Children (LAC) and previously LAC
- Pupils with Special Educational Needs and Disabilities (SEND) in line with the Child Protection and Safeguarding Policy and SEND policy.

## Reporting Procedures

If a staff member identifies a pupil who is experiencing or at risk of abuse or neglect, they must follow the reporting and referral procedures outlined in the Child Protection and Safeguarding Policy. For full guidance please see Safeguarding Reporting Process in the Child protection and Safeguarding policy.

## Reporting Staff Concerns

Any concerns regarding the actions or intentions of staff members (including tutors, volunteers and supply staff) that may risk harming a pupil must be reported immediately in accordance with the Child Protection and Safeguarding Policy or the Whistleblowing Policy to the Designated Safeguarding Lead (DSL), Mandy Ward, at 07985686992 or in the absence of the DSL contact Tracy Jordan Deputy DSL on 07715554656 [Tracy@newwaytuition.co.uk](mailto:Tracy@newwaytuition.co.uk)

## Whistleblowing Channels

If a staff member feels unable to raise a safeguarding issue internally. There are other means to use external whistleblowing channels, including contacting the NSPCC helpline at 0800 028 0285 (available 8:00 AM to 8:00 PM, Monday to Friday) or via email at [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Further guidance can be found at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing).

Please see the full guidance in the Whistleblowing Policy.

## Reporting Concerns About Senior Leadership

Concerns regarding the Director of the Senior Leadership Team (SLT) should be reported to the Designated Safeguarding Lead, Managing Director, Mandy Ward. For full guidance please read the Complaints Procedures Policy.

## Sharing Confidential Information

## Safeguarding Training

All staff receive a robust induction which includes safeguarding and child protection training which is updated annually. New Way Tuition provide regular safeguarding updates using various means of communications such as work emails and within staff meetings. Staff will be allocated additional ongoing training as part of their continuous professional development to safeguard everyone. For further information, please also refer to the Training and **Continuous Professional Development Training policy**

## Prevent Duty

All staff receive prevent training and this is updated each year as part of safeguarding training. Staff are aware of how to protect children from the risk of radicalization and terrorism. For full guidance see Prevent duty policy.



## Confidentiality

Staff must understand that confidentiality cannot be guaranteed to pupils. They should be familiar with the procedures to follow if a pupil discloses a safeguarding concern, in line with New Way Tuition's Child Protection and Safeguarding Policy and Data Protection GDPR Policy

## Legal Obligations

Staff must be aware of New Way Tuition's legal duty to refer any individual who has harmed, or poses a risk of harm to, a child or vulnerable adult to the Disclosure and Barring Service (DBS). This includes situations where:

- The harm test is satisfied regarding the individual.
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe they have committed a listed relevant offence.
- The individual has been removed from regulated activity or would have been removed if they had not left their position.

Please refer for full Guidance in the Safer Recruitment Policy.

## Appearance and Dress

### Expectations for Staff

New Way Tuition expects staff members to:

- Maintain a clean and neat appearance while at work or representing the organisation.
- Dress appropriately for their role, Wear professional, appropriate clothing (no flip-flops, or short shorts/skirts or hats)
- Long hair must be tied back for safety.
- Staff ID badges must always be worn.
- Act as role models for pupils, ensuring that their dress reflects this responsibility.
- Avoid attire that may cause embarrassment to anyone.
- Small earrings are acceptable (no hoop earrings)
- New Way Tuition is not liable for injuries due to inappropriate attire.

Please also refer to the Company Policy.

## Professional Behaviour and Conduct

### Respectful Treatment

Staff members are expected to treat colleagues, pupils, parents, and external contacts with dignity and respect.

## Language

The use of foul or abusive language is not tolerated.

## Discrimination and Harassment

Discrimination, bullying, harassment, or intimidation—whether physical, sexual, or verbal—will not be tolerated.

## Professional Integrity

Staff members must not misuse or misrepresent their position, qualifications, or experience, nor bring New Way Tuition into disrepute. Staff cannot complete a reference for another member of staff. All reference requests must be in writing to the Business Manager: Rebecca Lain via the work email [Rebecca@newwaytuition.co.uk](mailto:Rebecca@newwaytuition.co.uk) In line with the Company policy.

## Reporting Criminal Matters

Staff members must inform the Designated Safeguarding Lead (DSL) if they are subject to a criminal conviction, caution, ban, police inquiry, investigation, or pending prosecution in line with the Safer Recruitment Policy.

## Conduct on Trips

Staff are expected to maintain professional behaviour and conduct during extra-curricular trips and visits. All staff attending a trip or visit must adhere to this policy. Please also refer to the Behaviour policy and Child protection and safeguarding policy.

## Expression of Views

Staff will express their views appropriately, particularly regarding political matters, and will not use the organisation resources for party political purposes.

## Conduct Outside of Work

### Outside Work

Staff may undertake paid or voluntary work outside of New Way Tuition, provided that it does not conflict with the interests of the organisation. This work must not bring the organisation into disrepute or contravene working time regulations, nor should it adversely affect an individual's work performance.

## Reputation

Staff must not engage in outside work that could seriously damage the reputation and standing of New Way Tuition, their own reputation, or that of other members of the organisation community. New way has robust safeguarding procedures relating to criminal offences which includes carrying out a positive disclosure risk assessment and following set criteria to gain an assessment result. In line with the Safer Recruitment Policy.

## Social Media Conduct

Staff must refrain from inappropriate use of social networking sites that may bring themselves, the organisation, or the wider organisation community into disrepute. For full guidance please refer to the E-Safety Policy.

## Smoking, Alcohol, and Other Substances

### Smoking Policy

Staff are prohibited from smoking on or within a five-mile radius of New Way Tuition premises.

### Smoking During Supervision

Staff must not smoke while working with or supervising pupils off-site, including during educational visits and trips.

### Substance Use

Illegal drugs – The consumption of Illegal drugs is unacceptable and will not be tolerated. New Way Tuition reserves the right to address the matter with the employee and take appropriate action in accordance with the organisation’s disciplinary procedures. In line with the Disciplinary policy.

Alcohol - The consumption of alcohol during working hours is unacceptable and will not be tolerated. Staff members must never attend work under the influence of alcohol. New Way Tuition reserves the right to address the matter with the employee and take the appropriate action in accordance with the organisation’s disciplinary procedures. In line with the Disciplinary policy.

## Health and Safety

### Responsibilities

Staff members at New Way Tuition are expected to:

- Be familiar with and adhere to the organisation’s Health and Safety Policy, taking every action to keep themselves and everyone in the learning environment safe and well.
- Comply with health and safety regulations, using any provided safety equipment and protective clothing as required.
- Adhere to hygiene requirements to maintain a clean and safe working environment.
- Follow accident reporting procedures as outlined by the organisation.
- Inform the Managing Director of any paid work undertaken elsewhere to ensure compliance with The Working Time Regulations 1998 (as amended). If staff are working for another organisation or have their own company, they must adhere and sign the conflict-of-interest form. Please refer to the Health and Safety Policy, Disciplinary Policy and Safer Recruitment Policy.

## Declaration of Interests

### Requirement to Declare Interests

Staff members are required to declare any personal or financial interests that could conflict with the ethos or activities of New Way Tuition.

### Financial Conflicts of Interest

A financial conflict of interest occurs when there is, or appears to be, potential for personal financial gain, financial gain for close relatives or friends, or where an external party may reasonably perceive that financial benefits could influence an individual’s actions.

### Examples of Financial Interests

For this policy, “financial interest” includes, but is not limited to:

- Payments for services rendered
- Equity or ownership interests
- Intellectual property rights
- Gifts or hospitality

### Declaration of Financial Interests

Examples of financial interests that must be declared include equity stakes in services or companies under consideration for use by New Way Tuition.

## Non-Financial Conflicts of Interest

Non-financial conflicts of interest may also conflict with an individual's professional obligations. These could include any advantage or benefit, such as career advancement or personal gain for family members or close associates.

## Examples of Non-Financial Conflicts

Situations that may give rise to non-financial conflicts of interest include:

- Pressure or temptation to accept gifts, inducements, or hospitality
- Involvement in hiring, promoting, supervising, or evaluating a person with whom the staff member has a close personal relationship
- The development of a close personal relationship with a colleague, which could influence professional conduct

## Trade Union Membership

Membership in a trade union or staff representative group does not need to be declared.

## Consideration of Relationships

Staff should also consider whether they need to declare relationships with any individual that might conflict with their duties at New Way Tuition.

## Consequences of non-declaration

Failure to declare relevant interests is a serious breach of trust. Staff who are unsure whether a declaration is necessary are encouraged to consult with New Way Tuition or their trade union.

## Register of Business Interests

All declarations, including nil returns, must be submitted in writing to the Directors for inclusion in the Register of Business Interests.

## Relationships with Pupils

## Maintaining Professional Boundaries

New Way Tuition expects that staff will:

- Always maintain professional boundaries with pupils, ensuring that their actions are warranted, proportionate, safe, and necessary.
- Act in an open and transparent manner to avoid any action that could lead to questions about their professional conduct.
- Avoid establishing social contact with pupils to build friendships or personal relationships.
- Refrain from developing personal or sexual relationships with pupils, including making sexual remarks or discussing their own sexual relationships with, or in the presence of, pupils.
- Only contact pupils through the organisation's established communication channels, personal phone numbers, email addresses, or social media platforms must not be used for pupil contact.

## Position of Trust

Under the Sexual Offences Act 2003, it is an offence for an individual aged 18 or older to engage in a sexual relationship with a child under 18 if that individual holds a position of trust in relation to the child, regardless of consent. In 2022, the Police, Crime, Sentencing and Courts Act expanded the definition of "positions of trust" to include individuals who coach, teach, train, supervise, or instruct in sports or religious settings. New Way Tuition updates all policies and procedures in line with new Legislation to safeguard everyone.

## Physical Contact with Pupils

### Appropriate Physical Contact

At New Way Tuition, we recognise there are situations where physical contact with pupils is necessary, such as administering first aid or assisting with intimate care following a written agreement/information via their Lead Manager such as a risk assessment/care plan. Staff must conduct any such contact professionally. Physical contact must always be responsive to the pupil's needs, limited in duration, and appropriate for their age, development stage, gender, ethnicity, and background. Please refer to the Training and Continuous Professional Development Policy.

### Consent for Contact

Where possible, staff will seek the pupil's permission before initiating any physical contact. Tutors, staff must liaise with their Lead Manager.

### Use of Reasonable Force

The **Use of Reasonable Force** policy at New Way Tuition outlines the principles and procedures staff should follow when considering and using physical intervention with pupils. The policy ensures that the use of force is always a last resort, and it is used only in situations where it is necessary to protect a pupil or others from harm, maintain order, or prevent damage to property.

For full guidance refer to the **Reasonable Force Policy**

## Awareness of Misinterpretation

Staff should remain aware that physical contact, even when well-intentioned, may be misconstrued by pupils or observers. Staff should be ready to justify their actions if necessary.

## Prohibited Contact

Engaging in rough play, tickling, or play fighting with pupils is not permitted.

## Extra Caution for Vulnerable Pupils

Staff should exercise extra caution when working with pupils who have experienced abuse or neglect.

## Transparency

Physical contact should not be secretive. If an action could be misinterpreted, staff will report it to the Managing Director/DSL, and appropriate procedures will be followed.

## Demonstrating in PE

If it is necessary to demonstrate equipment use during PE/Gym sessions, staff should use another staff member whenever possible. If a pupil's participation is required, their consent will be sought.

## Comforting Distressed Pupils

In cases of distress, staff may use age-appropriate contact, such as a hand on the pupil's shoulder, and should ensure that such gestures are non-intrusive and not open to misinterpretation.

## Transporting Pupils

Staff must not transport pupils. Never transport a pupil to hospital in your own vehicle following an accident. Call an ambulance. In line with the Company Policy.

## Financial Inducements

### Financial Regulations and Gift Declaration

Staff members will:

- Follow financial regulations and declare any gifts received to the Business Manager in writing, except for:
  - - Low-cost, functional items branded with the supplier's logo.
    - Non-monetary gifts of appreciation from parents or pupils.
    - Meals or drinks in a business meeting setting.
    - Organisation-authorized visits to exhibitions, conferences, and business meals.
- Return any personal gifts, payments, or incentives from business contacts.
- Declare any non-returnable gifts to the Managing Director, who will decide on their use.
- Obtain the Managing Director's authorisation before accepting event invitations.

## Acceptable Use of Technology

### Online Safety Compliance

Staff must comply with the E-Safety Policy and Acceptable Use Agreement.

### Mobile Phones

Tuition Sessions: Tutors must have access to a mobile phone in the event of an emergency and if the need arises to liaise with the parent or contact their NWT Lead Manager/DSL. During tuition tutors are not allowed to use their mobile phones for personal use.

Please also refer to the Child Protection and Safeguarding policy for more information relating to Bring your own Device policy.

### Security Settings

New way has an IT Specialist for support. Staff using their own device for work such as laptop or computers must ensure an IT specialist has overseen all security measures and that devices fully compliant with the Bring your own Device policy. Illegal or inappropriate use of equipment may result in disciplinary action. For further information please refer to the Disciplinary policy and procedure.



## Social Media Conduct

Engaging with pupils or their families on social media is prohibited, including friend requests or following on social platforms.

## Responsible Online Presence

Staff should be mindful of their online presence, ensuring that any posts, images, videos, or views do not reflect poorly on themselves, *New Way Tuition*, or the organisation's community.

## Premises, Equipment, and Communication

### Usage of the organisation Resources

Equipment and systems are for *New Way Tuition* activities only unless authorised by the Managing Director.

### Receiving Inappropriate Communication

Staff receiving inappropriate communication or unsure of the appropriateness of an action should consult the Designated Safeguarding Lead/Managing Director.

### System Monitoring

The organisation reserves the right to monitor systems to prevent misuse, ensure proper use, and protect against viruses.

### Access for Investigations

Access to communication systems may be granted to the Lead Managers for investigation purposes, with the Managing Director's permission.

### Password Confidentiality

Passwords must remain confidential unless requested by the Managing Director and /or a Lead Manager and breaches may result in disciplinary action.

### Equipment Return

Equipment used outside the premises must be returned when employment (applicable to all employees) or the end date agreed for all staff ends or upon request.

## Photography and Videos

Please refer to the Media Consent Policy for further information. This is in conjunction with the named policies to ensure all photographs and videos are taken and used appropriately and in compliance with Data Protection. Please also refer to, the Child Protection and Safeguarding Policy, Bring your Own Device Policy, The Data Protection GDPR Policy and WhatsApp Policy.

## Confidentiality Obligations

Sensitive information about *New Way Tuition*, its staff, or any other organisation should not be disclosed. In line with the Data Protection GDPR Policy.

## Disclosure for Pupil Welfare

Confidential information may only be disclosed when it raises concerns about pupil safety or welfare on a need-to-know basis in line with the Child protection and Safeguarding Policy and the Data Protection GDPR Policy. Deliberate falsification of documents/information, such as references or qualifications, is prohibited. Such actions are grounds for disciplinary action and may be a criminal offence.

## Access to Personal Data

Staff have the right to request access to their data by writing to the Managing Director/ DSL in line with the Data Protection GDPR Policy.

## Monitoring and Review

New Tuition provides a robust staff induction which provides all staff with New Way Tuitions policies and procedures relating to the organisation and actively encourages staffs' contributions and communicates all updates.