



Statement of Intent

We expect all participants to receive high-quality coaching and learning in a positive and respectful environment. Staff should understand that their own behaviour, and the manner in which they conduct themselves with their colleagues, the participants, parents and any other stakeholders, sets an example. We recognise that the majority of staff act appropriately and treat each other with dignity and respect; however, we consider it important to clarify the expected standards.

This document aims to set out the standard of conduct we expect all staff to follow.

This code of conduct is not exhaustive and if situations arise that are not covered by this document, staff will use their professional judgement and act in the best interests of the company and its participants. Staff should be aware that failure to follow the code of conduct may result in disciplinary action being taken, as set out in our disciplinary procedures.

Legislation and guidance

This policy has due regard to all legislation including, but not limited to, the following:

- [The General Data Protection Regulation \(GDPR\)](#)
- [Data Protection Act 2018](#)
- [The Children Act 1989](#)
- [The Working Time Regulations 1998 \(as amended\)](#)
- [Sexual Offences Act 2003](#)

This policy also has due regard to statutory guidance including, but not limited to, the following:

- [Keeping children safe in education](#)
- [Working together to safeguard children](#)

Safeguarding participants

In accordance with 'Keeping children safe in education', all staff members have a responsibility to:

- Safeguard participants and protect their welfare.
- Provide a learning environment in which participants feel safe, secure and respected.

To effectively safeguard participants, all members of staff are required to follow the procedures outlined in this code of conduct and the Child Protection and Safeguarding policy, ensuring that they do not act in a way that may put participants at risk of harm or lead others to question their actions.

In accordance with the Creative Sports Coaching CIC's Child Protection and Safeguarding policy, staff will be prepared to identify participants who may be subject to, or at risk of, the following types of abuse and neglect:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Peer-on-peer abuse
- Serious violence
- FGM
- Child sexual exploitation
- Child criminal exploitation

If a member of staff identifies a participant who is subject to, or at risk of, the abuse and neglect mentioned above, they will follow the necessary reporting and referral procedures outlined in the Child Protection and Safeguarding policy in accordance with the company's Child Protection and Safeguarding policy, staff will also be aware that the following factors could increase a participant's risk of being subject to safeguarding issues:

- Participants who need a social worker (Child in Need and Child Protection plans)
- Participants requiring mental health support
- LAC and previously LAC
- Participants with SEND

Any member of staff who has concerns about a staff member's (including volunteers and supply staff) actions or intent that may lead to a participant being put at risk of harm will report this to the company Director who is responsible for dealing with allegations of abuse against staff, so appropriate action can be taken.

If a member of staff feels unable to raise an issue with the company they will use other whistleblowing channels, including contacting the NSPCC's helpline on 0800 028 0285 (between the hours of 9am and 8:00pm Monday to Friday) or email help@nspcc.org.uk. Staff can also access guidance at www.gov.uk/whistleblowing.

All staff will undertake appropriate safeguarding and child protection training; additionally, all staff will receive regular safeguarding and child protection updates.

Staff will be aware that confidentiality will never be promised to a participant; if a participant discloses a potential safeguarding issue, staff will follow the procedure set out in the Child Protection and Safeguarding policy.

Staff will be aware of the company's legal duty to refer anyone who has harmed or poses a risk of harm to a child or vulnerable adult to the DBS. This includes where:

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

Appearance and dress

Creative Sports Coaching CIC expects staff to:

- Ensure that their appearance is clean and neat when at work or representing the company.
- Dress in a manner that is appropriate to their role.
- Remember that they are role models for participants and that their dress and appearance should reflect this.
- Not dress in a way that would cause embarrassment to participants, parents, colleagues or other stakeholders.

Attendance

Creative Sports Coaching CIC expects staff to:

- Attend work in accordance with their contract of employment and associated terms and conditions in relation to hours, days of work and holidays.
- Make routine medical and dental appointments outside of their working hours or during holidays where possible.
- Speak with their line manager or company Director if they need time off for any reason other than personal illness.
- Report absence in the correct procedure when they are absent from work due to illness or injury.

Professional behaviour and conduct

Staff are expected to treat other colleagues, participants, parents and external contacts with dignity and respect. The use of foul and abusive language will not be tolerated.

Discrimination, bullying, harassment or intimidation, including physical, sexual and verbal abuse, will not be tolerated. Staff will not misuse or misrepresent their position, qualifications or experience, or bring the company into disrepute. Staff will inform the company Director if they are subject to a criminal conviction, caution, ban, police enquiry, investigation or pending prosecution.

Staff will be aware that professional behaviour and conduct is expected to be extended to any trips and/or visits too. All staff attending a trip or visit will act in accordance with this policy.

Staff will act appropriately in terms of the views they express (in particular political views) and the use of company resources at all times and will not use company resources for party political purposes.

Conduct outside of work

Staff may undertake additional work outside of the role with Creative Sports Coaching CIC either paid or voluntary, provided that it does not conflict with the interests of the company. The nature of the work cannot be seen to bring the company into disrepute, nor be at a level which may contravene the working time regulations or affect an individual's work performance.

Staff will not engage in conduct outside of work which could bring the company into disrepute or seriously damage the employee's reputation or the reputation of other members of the staff. This includes criminal offences that involve violence, sexual misconduct or possession or use of illegal drugs, as well as negative comments about the company on social media.

Staff will not engage in inappropriate use of social network sites which may bring themselves, the company, other staff or employer into disrepute.

Smoking, alcohol and other substances

Staff will not smoke on or within a one-mile radius of the premises. They are working at Staff will not smoke whilst working with or supervising participants off-site, such as when on visits and trips.

The taking of illegal drugs or alcohol during working hours is unacceptable and will not be tolerated. Staff must never attend work under the influence of alcohol or illegal drugs. If alcohol or drug usage impacts on a member of staff's performance, the company has the right to discuss the matter with the employee and take appropriate action in accordance with the company's disciplinary procedures, including referral to the police.

Health and safety

- Be familiar with and adhere to Creative Sports Coaching CIC's Health and Safety policy and ensure that they take every action to keep themselves and everyone in the organisations environment safe and well.
- Comply with health and safety regulations and use any safety equipment and protective clothing which is supplied to them.
- Comply with hygiene requirements.
- Comply with accident reporting requirements.
- Inform the company Director of any paid work which is undertaken elsewhere, for compliance with The Working Time Regulations 1998 (as amended).

Declaration of interests

Staff are required to declare their interests, both personal and financial, where the group or organisation they are affiliated with would be considered to be in conflict with the ethos of Creative Sports Coaching CIC.

For the purposes of this policy, a financial conflict of interest is one where there is, or appears to be, opportunity for personal financial gain, financial gain for close relatives or friends, or where it may be reasonable for a third party to take the view that financial benefits may affect an individual's actions. The term 'financial interest' means anything of monetary value, including the following:

- Payments for services

- Equity interests
- Intellectual property rights
- Hospitality or gifts

Examples of financial interests that must be declared include, but are not limited to, equity interests in services considered for use by the company.

Non-financial conflicts of interest can also come into conflict, or be perceived to come into conflict, with an individual's obligations or commitments to the company. These interests may include any benefit or advantage including, but not limited to, direct or indirect enhancement of an individual's career or gain for immediate family or someone with whom the individual has a close relationship.

Examples of situations that could give rise to non-financial conflicts of interest include the following:

- Pressure or temptation to accept gifts, inducements or hospitality.
- Participating in the appointment, hiring, promotion, supervision or evaluation of a person with whom the individual has a close personal relationship.
- Where a member of staff has or develops a close personal relationship with a colleague.

Staff will also carefully consider whether they need to declare their relationship with any individual where this might cause a conflict with company activities. Membership to a trade union or a representative group does not need to be declared.

Failure to make a relevant declaration of interest is a very serious breach of trust and if employees are in doubt about a declaration, they are advised to contact a representative or their trade union. All declarations, including nil returns, will be submitted in writing to the company Director for inclusion on the Register of Business Interests.

Relationships with school pupils

Staff are expected to observe proper boundaries with participants that are appropriate to their professional position. They will act in a fair, open and transparent way that would not lead to others questioning their actions.

If a member of staff must spend time on a one-to-one basis with a participant, they will ensure that:

- This takes place in a public place that others can access
- Others can see into the room
- A colleague knows this is taking place

Staff should avoid contact with participants outside of working hours. Personal contact details must not be exchanged between staff and participants. This includes social media profiles.

Whilst we are aware that many participants and their parents may wish to give gifts to staff, for example, at the end of the year, gifts from staff to participants are not acceptable.

If a member of staff is concerned at any point that an interaction between themselves and a participant may be misinterpreted, this should be reported to the company Director.

Physical contact with participants

Creative Sports Coaching CIC understands that there are circumstances in which it is entirely necessary for staff to have physical contact with pupils, for example, when applying first aid and assisting with intimate care, but staff will only do so in a professional and appropriate manner, in line with the relevant policies.

When physical contact is made with participants, it is imperative that it is conducted in a way which is responsive to the participant's needs, is of limited duration and is appropriate to their age, stage of development, gender, ethnicity and background. Staff will seek the participant's permission, where possible, before initiating contact.

Staff will always use their professional judgement when determining what physical contact is appropriate, as this may differ between participants. As such, the participant's feelings and wishes will always be taken into account. Staff will never touch a participant in a way which is indecent and will always be prepared to explain their actions. Staff will be aware that even well-intentioned physical contact may

be misconstrued by a participant, an observer or by anyone to whom this action is described and, therefore, will be prepared to justify their actions. Staff will not engage in rough play, tickling or play fights with participants. Extra caution will be taken where it is known that a participant has previously suffered from abuse or neglect.

Physical contact will never be secretive; if a member of staff believes an action could be misinterpreted, this will be reported to the company Directors and appropriate procedures will be followed. Where it is necessary in PE lessons for staff to demonstrate use of equipment, this will be conducted with another member of staff if possible. If a participant is required to participate, their consent will be given before doing so.

If a child is in distress and in need of comfort as reassurance, staff may use age-appropriate physical contact, such as placing their hand on the participant's shoulder. Staff will remain self-aware of their actions at all times and ensure that their contact is not threatening, intrusive or subject to misinterpretation.

Staff may also use reasonable force as a means of physical contact with pupils for restraint purposes. Such instances will always be in accordance with Creative Sports CIC policies.

Changing

Participants are entitled to respect and privacy whilst they are changing, for example, for PE lessons, however, a level of supervision is required to ensure that participants are safe. The supervision will be appropriate to the needs and ages of the participants, and sensitive to the potential for embarrassment. Staff will never change in the same area as participants.

Transporting participants

When it is necessary to transport participants, staff will ensure that the transport arrangements of the vehicle meet all legal requirements, they have an appropriate licence, and the vehicle is roadworthy, has a valid MOT certificate and is insured.

Staff will gain consent from parents before transporting participants and will be aware that the welfare of all participant in the vehicle is their responsibility. Two or more members of staff will be present in the vehicle to avoid any discrepancy regarding safeguarding concerns.

Financial inducements

Staff will:

- Declare to the company, in writing, any gifts received, with the exception of:
 - Low cost, functional items suitable for business rather than personal use and displaying the supplier's logo - these items may be accepted.
 - Gifts offered by parents or participants and should always refuse monetary gifts
 - Hospitality in the form of meals and drinks where it is part of a normal business meeting.
 - Authorised visits to exhibitions, demonstrations, conferences, business meals and social functions in connection with the company's business, which shall be at the company's expense.
- Not accept a personal gift, payment or other incentive from a business contact - any such gifts should be returned.
- Declare any gift that cannot be returned to the provider, who will decide how it will be used.
- Only accept offers to specific events after authorisation from the company

Acceptable use of technology

Staff are required to employ the highest security settings on any personal profiles they may have and will not engage in inappropriate use of social networking sites, including contacting participants or their family members, accepting or inviting friend requests from participants or their family members, or following participants or their family members on social media.

The company understands that some members of staff are also parents of participants within the sessions and, therefore, may wish to contact other parents. When doing so, staff will exercise their professional judgement and will not contact family members on social media if this leads to a conflict of interest.

Staff will remain mindful of their use of social media and their web-based presence, including written content, videos or photographs, and views expressed directly or indirectly which may bring themselves, the company or staff into disrepute.

Premises, equipment and communication

Company equipment and systems are available only for work-related activities and will not be used for the fulfilment of another job or for personal use, unless specifically authorised by the company Directors. Illegal, inappropriate or unacceptable use of company equipment or communication systems may result in disciplinary action and, in serious cases, could lead to an employee's dismissal.

Employees receiving inappropriate communication or material, or who are unsure about whether something they propose to do might breach this code of conduct, should seek advice from the company Director. The company reserves the right to monitor emails, phone calls, internet activity or document production, principally in order to avoid offensive or nuisance material and to protect systems from viruses, but also to ensure proper and effective use of systems.

Communication systems may be accessed when the company suspects that the employee has been misusing systems or facilities, or for the investigation of suspected fraud or other irregularity. Access will be secured by the company Directors.

Passwords should not be shared and access to computer systems must be kept confidential, except on the express request of the company Directors. Breaches of this confidentiality may be subject to disciplinary action.

Company equipment that is used, such as laptops and iPads, will be returned to the company when the employee leaves employment or if requested to do so by the company Directors.

Photography and videos

Photographs and videos will only be taken using company equipment; using personal mobile phones for this purpose is prohibited. Consent for taking photographs and videos will be obtained from parents, and where consent is not given their wishes will be respected.

All photographs and videos will be available for scrutiny and staff will be prepared to justify the images or footage taken. Careful consideration will always be given to the activities which are being filmed or photographed, to ensure that images or videos are not indecent and cannot be misused.

Data protection and confidentiality

Regarding personal and sensitive data, staff are required under the GDPR and the Data Protection Act 2018 to:

- Consider the legal basis for collecting the data, ensuring that this is documented.
- Ensure that the data is stored on a GDPR-compliant server and that the data is not held for any longer than necessary.
- Securely dispose of the data when the relevant retention period ends.

Staff will not disclose sensitive information about Creative Sports Coaching CIC, its employees or other parties. The only exception whereby it is acceptable for a member of staff to disclose information that would otherwise be considered confidential is when the confidential information gives rise to concerns about the safety or welfare of a participant.

Staff have the right to request access to data that is held about them. Such requests will be made to the company Director in writing, in accordance with the company's Data Protection policy.

Probity of records

The deliberate falsification of documents, such as references, academic qualifications or legal documents, is unacceptable. Where a member of staff falsifies records or other documents, including

those held electronically, this will be regarded as a serious disciplinary matter and potentially a criminal offence.

Contacts

Staff will not use company business contacts for acquiring materials or services at trade/discount prices for non-company activities, unless participating in concessionary schemes arranged by trade unions or other such groups.

Compliance

All staff must complete the form in Appendix 1 to confirm they have read, understood and agree to comply with this code of conduct. This form must be signed and dated.

Monitoring and review

This document will be reviewed annually and any changes made will be communicated to all members of staff. The next scheduled review date of this document is September 2025.

All members of staff are required to familiarise themselves with this document as part of their induction.

Links with other policies

This policy should be read in conjunction with all Creative Sports Coaching CIC's policies and documents:

Appendix 1

Confirmation of compliance

I hereby confirm that I have read, understood and agree to comply with Creative Sports Coaching CIC's code of conduct.

Print name: **Position:**

Signed: **Date:**

Please return this completed form to the company Directors.