



Oak Activities

Code of Conduct

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1. Policy Statement

1.1 Oak Activities is committed to being a fair and reasonable employer and expects reasonable standards of behaviour and conduct from employees. The Company will support employees through guidance, information, advice, training or other suitable approaches to achieve acceptable standards of behaviour and conduct.

1.2 Staff should also refer to the most recent versions of the following guidance (statutory and non-statutory):

- Keeping Children Safe in Education 2025
- Working Together to Safeguard Children 2026
- Guidance for Safer Working Practice for those working with Children and Young People in Education Settings.

1.3 This Code cannot provide an exhaustive list of what is, or is not, appropriate behaviour for adults. However, it does highlight behaviour that is illegal, inappropriate, or inadvisable in relation to the required professional standards. There will be occasions and circumstances in which adults must make decisions or act in the best interests of the pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour to secure the best interests and welfare of the pupils.

1.4 For clarity, the Senior Leadership Team refers to Michael Kaoura, Business Development and Compliance Director, Stuart Nunn, Group Operations Director, Tom Milner, Managing Director.

2. Scope of the policy

2.1 A Code of Conduct is designed to give clear guidance on the standards of behaviour all staff are expected to observe, and the Company should notify staff of this code and the expectations.

2.2 Oak Activities staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all the pupils within the setting.

2.3 Each employee has an individual responsibility to maintain their reputation and the reputation of the Company, whether inside or outside working hours. This Code of Conduct applies to: a) all staff who are employed by Oak Activities; b) employees of external contractors and providers of services (i.e. all agency staff).

3. Disciplinary Action

3.1 Any behaviour in breach of this Code by employees may result in action under our disciplinary procedure. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. In certain cases, behaviour in breach of this Code may also lead to a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) and may result in criminal proceedings where appropriate. Some breaches may be considered low-level concerns which may be dealt with informally or formally under the disciplinary procedure.



4. Whistleblowing

4.1 Adults must raise any concerns they have about the safeguarding or child protection practices by following the Oak Activities Whistleblowing Policy, which is available on MyConcern/SAMsPeople and presented on whistleblowing posters in all Oak Activities provisions. An adult who raises a matter under the whistleblowing policy or makes a public interest disclosure will have the protection of the relevant legislation.

4.2 If a member of staff feels like they are unable to raise a safeguarding-related concern with the Oak Activities or feels that their genuine concerns are not being addressed, they are able to contact the NSPCC Whistleblowing Helpline on 0800 028 0285 or the LADO for the specific area of where the concern is raised e.g. Cambridgeshire or Peterborough LADO, which can be found on page two of the Company's Safeguarding and Child Protection Policy.

4.3 Allegations of Abuse Against Oak Activities staff and Volunteers

Where it is alleged that an adult has:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they would pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The Oak Activities Senior Leadership Team will follow the company procedure for dealing with allegations of abuse against staff and volunteers and the guidance set out in part four of Keeping Children Safe in Education (KCSIE) and report any allegation that may meet the harm threshold to the Local Authority Designated Officer (LADO) without delay.

5. Setting an example

5.1 All staff must act in accordance with Oak's values, ethos, policies and procedures.

5.2 All staff set examples of behaviour and conduct which may be copied by pupils. Staff must therefore avoid using inappropriate or offensive language at all times.

5.3 All staff must, therefore, demonstrate high standards of conduct in order to encourage our pupils to do the same.

5.4 All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

5.5 This Code helps all staff to understand what behaviour is and is not acceptable.

5.6 While we respect individual views, staff must not use their role or the workplace to promote personal political beliefs. This includes making political statements on behalf of the company, displaying political materials at work, or engaging in political debate that could cause discomfort to colleagues or pupils. Employees are free to hold their own views, but these should be kept separate from their professional responsibilities.

5.7 Staff are expected to dress in a smart and professional manner that reflects their role and responsibilities and, where relevant, appropriate to the young people attending their site, including the wearing of appropriate safety clothing and equipment, in accordance with all Health and Safety regulations.

5.8 For the safety of our staff and young people in our care, delivery staff (and any staff members who visit sites) must wear appropriate style of shorts/skirts, which must of an appropriate length, and must have their shoulders and décolletage covered at all times when around young people.

5.9 All staff must wear appropriate footwear at all times. For safety reasons, shoes such as sandals, crocs, flip flops, or those similar in style **are not permitted**. There are no exceptional circumstances in which such footwear is acceptable to wear on site.

6. Professional Standards

6.1 All adults, as appropriate to the role and/or job description of the individual, must:

- Place the well-being and learning of pupils at the centre of their professional practice.
- Have high expectations for all pupils, and work to help pupils progress regardless of their background and personal circumstances.
- Treat pupils fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality.
- Model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people.
- Respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education.
- Seek to work in partnership with parents and carers, respecting their views and promoting understanding and cooperation to support the young person's learning and wellbeing in and out of School
- Reflect on their own practice, develop their skills, knowledge, and expertise, and adapt appropriately to learn with and from colleagues.
- Ensure that the same professional standards are always applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.

6.2 Individuals should not:

- Behave in a manner that would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model.
- Make, or encourage others to make sexual remarks to, or about, a pupil.
- Use inappropriate language to or in the presence of pupils.
- Discuss their personal or sexual relationships with or in the presence of pupils.
- Make, or encourage others to make, unprofessional personal comments that scapegoat, demean, discriminate, or humiliate, or might be interpreted as such.
- Behaving in an unsuitable way towards, around or to children may result in disqualification from childcare under the Childcare Act 2006, prohibition from teaching by the Teaching Regulation Agency (TRA), a bar from engaging in regulated activity, or action by another relevant regulatory.

7. Safeguarding young people

7.1 Staff have a duty to safeguard pupils from:

1. physical abuse
2. sexual abuse

3. emotional abuse
4. neglect

7.2 The duty to safeguard pupils includes the duty to report and log concerns about a pupil in accordance with the Company's Safeguarding Policy.

7.3 Staff are provided with personal copies of the Company's Safeguarding, Child Protection Policy, Prevent Strategy and Whistleblowing Procedure and staff must have read these documents and ideally have received training on how to implement them.

7.4 Under no circumstances should any staff member or volunteer inflict physical or psychological harm on a child or young person. Any actions or behaviours that may constitute harm, including inappropriate restraint, intimidation, humiliation, or coercion, are strictly prohibited and will be treated as a serious safeguarding concern. Such concerns will be managed in line with the Company's safeguarding and disciplinary procedures.

7.5 Staff must not demean or undermine pupils, their parents or carers, or colleagues.

7.6 Staff must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.

7.7 Where staff have any safeguarding concerns about another member of staff their concerns must be reported immediately to the DSO.

8. Low Level Concerns

8.1 In accordance with Part Four of KCSIE, a low-level concern is defined as behaviour towards a child that does not meet the harm threshold, as outlined in section 4 above, but is a concern that an adult, working in or on behalf of the school, may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- does not meet the threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of low-level concerns could include, but are not limited to:

- being over-friendly with children/being over strict with children
- having favourites/disfavouring pupils
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- A centralised record of low-level concerns will be maintained by the school, as required by KCSIE

8.2 Oak Activities is committed to creating and embedding a culture of openness, trust, and transparency in which the school's values and expected behaviours, as set out in this policy, are adhered to, monitored, and reinforced by all staff. All adults have a duty to report low-level concerns, in addition to concerns that meet the harm threshold, to those with designated safeguarding responsibilities to ensure matters are dealt with promptly and appropriately. Oak Activities Senior Leadership Team will manage all such concerns in accordance with Part Four of Keeping Children Safe in Education.



8.3 If an adult has found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards, the adult should self-refer to those with designated safeguarding responsibilities. The Oak Activities Senior Leadership Team is committed to creating an environment where staff are encouraged and feel confident to self-refer.

9. Equality issues

9.1 Staff must comply with equality policies in relation to employment and their duties and responsibilities are adhered to.

9.2 The Company will not tolerate any harassment, sexual harassment, intimidation, unfair discrimination or victimisation, by staff against pupils, colleagues, parents, or other visitors.

10. Relationships and contact between Oak Activities staff – the public, parents, and pupils

10.1 Staff should always be courteous and impartial towards all pupils and stakeholders. Staff must always treat pupils courteously observing proper boundaries.

10.2 It is Company policy that there will be no personal contact other than in exempted circumstances, with prior agreement from the Group Operations Director, between staff and current/former pupils up to 19 years of age outside of the setting.

10.3 Any physical contact between adults and children up to 19 years of age or adults and children who attend Oak Activities must be undertaken in a completely professional matter.

10.4 Any such conduct may have the potential to place the adult in an extremely difficult situation (staff should also refer to the Guidance for Safer Working Practice for those working with Children and Young People in Education Settings).

10.5 If any contact is received via pupils that is deemed an immediate safeguarding concern, e.g. suicidal ideation disclosures (this is not an exhaustive list), call 999 and report to the appropriate emergency services.

10.6 Also refer to Oak Activities Safeguarding and Child Protection Policy and contact Senior DSL's michael.kaoura@oakactivities.com, stuart.nimmo@oakactivities.com or refer to the appropriate agencies.

10.7 Any correspondence between Oak Activities Staff and families of pupils that attend our settings must be communicated via an Oak Activities device. All correspondence that relates to safeguarding must be recorded on MyConcern.

10.8 Correspondence received by a member of staff from former pupils, the public or parents should always be discussed with their Line Manager and filed with any response in the appropriate records system. In the case of the Alternative Provision Manager they should discuss this with the Group Operations Director.

10.9 The Company recognises that pupils may, from time to time, develop feelings of admiration, infatuation, or "crushes" towards staff or other individuals within the company. While these feelings can be a normal part of growing up, it is important that they are managed appropriately in order to protect the wellbeing of pupils and maintain professional boundaries.

- Staff have a duty to maintain clear, professional, and consistent boundaries at all times.



- Any behaviour from pupils that suggests a crush or infatuation will be managed sensitively and appropriately, with staff responding in a way that does not embarrass, encourage, or shame the pupil.
- Staff must not reciprocate or encourage such feelings in any way, nor engage in conversations or behaviours that could be interpreted as inappropriate or unprofessional.
- Where necessary, and in line with safeguarding procedures, concerns arising from a pupil's behaviour will be recorded and shared with the designated safeguarding lead.

Examples of situations that must be reported are given below:

- Where an adult is concerned that they might be developing a relationship with a pupil which could have the potential to represent an abuse of trust
- Where an adult is concerned that a pupil is becoming attracted to them or that there is a developing attachment or dependency
- Where an adult is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others
- Where an adult is concerned about the apparent development of a relationship by another adult or receives information about such a relationship

10.10 It is acknowledged that adults may have genuine friendships and social contact with parents or carers of pupils, independent of the professional relationship. Adults should, however:

- Inform senior management of any relationship with a parent/carer where this extends beyond the usual parent/carer/professional relationship.
- Advise senior management of any regular social contact they have with a pupil or parent/carer, which could give rise to concern.
- Inform senior management of any requests or arrangements where parents/carers wish to use their services outside of the workplace e.g., babysitting, tutoring.
- Always approve any planned social contact with pupils or parents/carers with senior colleagues, for example, when it is part of a reward scheme.
- If a parent/carer seeks to establish social contact, or if this occurs coincidentally, the adult should exercise their professional judgment and should ensure that all communications are transparent and open to scrutiny.
- Some employees may, as part of their professional role, be required to support a parent or carer. If that person comes to depend upon the employee or seeks support outside of their professional role this should be discussed with senior management and, where necessary, referrals made to the appropriate support agency.

11. Sexual Contact with Children and Young People and Abuse of Trust

11.1 A relationship between an adult and a child or young person is not a relationship between equals; the adult has a position of trust, power, or influence. There is potential for exploitation and harm of children or vulnerable young people and all adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Adults must not use their position to gain access to information for their own advantage and/or a pupil's or family's detriment or use their power to intimidate, threaten, coerce, or undermine current or former pupils. Adults must not use their status or position to form or promote relationships with children (whether current or former pupils or not), that are of a sexual nature, or which may become so.

11.2 Adults should maintain appropriate professional boundaries and avoid behaviour that might be misinterpreted by others. They should report any incident with this potential to a senior manager. This is as relevant in the online world as it is in the classroom; staff engaging with pupils and/or parents online have a responsibility to always model safe practice.

11.3 Any sexual behaviour or activity, whether homosexual or heterosexual, by an adult with or towards a child/pupil or young person, is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. Where a person aged 18 or over is in a specified position of trust with a child or young person under 18 years, the Sexual Offences Act 2003 makes it an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

11.4 Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children. 'Working Together to Safeguard Children', Appendix A defines sexual abuse as "...forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening..."

11.5 Adults must not have sexual relationships with pupils or have any form of communication with a child, which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, texts, electronic mail, phone calls, social networking contact or physical contact. The adult should not make sexual remarks to, or about, a child or discuss their own sexual relationships with or in the presence of pupils. Adults should take care that their language or conduct does not give rise to comm There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person and manipulate that relationship so that sexual abuse can take place. Adults should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.

12. Physical Contact

12.1 Physical contact should never be secretive, casual, or for the gratification of the adult, or represent a misuse of authority. Adults should never touch a pupil in a way that may be considered indecent. If an adult believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible to the Alternative Provision Manager or another designated safeguarding lead.

12.2 Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open School policy and subject to review. Where feasible, employees should seek the pupil's permission before initiating contact.



Adults should listen, observe, and take note of the pupil's reaction or feelings and so far, as is possible, use a level of contact which is acceptable to the pupil for the minimum time necessary.

12.3 There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Adults should always remain self-aware in order that their contact is not threatening, intrusive or subject to misinterpretation. Adults should always tell a colleague when and how they offered comfort to a distressed pupil.

12.4 Where an adult has a particular concern about the need to provide this type of care and reassurance, they should seek further advice from a senior manager.

12.5 All parties should clearly understand from the Company's pupil onboarding process what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers informed of the extent and nature of any physical contact may also prevent allegations of misconduct from arising. Any incidents of physical contact that cause concern or fall outside of these protocols and guidance should be reported to the senior manager and parent/carer.

12.6 Oak Activities staff are not expected to deliver personal care although there may be exceptional circumstances where personal care is required. In these circumstances, staff will be spoken with and given the opportunity to agree or decline administering personal care, via a consent form. Where staff agree to do so they will receive appropriate training and written guidance, including a care plan for any pupil who is expected to require such support. Staff must follow the Company's Intimate and Personal Care Policy. No adult outside of the designated staff team should be involved in personal care unless in an emergency.

Where appropriate, staff may offer verbal or visual prompts to support pupils in developing independence with personal care. This can be an important and proportionate step for pupils working towards managing these tasks themselves. However, staff must not undertake any personal or intimate care tasks that a pupil is capable of completing independently.

To minimise the risk of safeguarding allegations for both pupils and staff, it is advised that intimate care is carried out in the vicinity of another adult wherever possible — one of whom may act solely in a monitoring capacity. In such instances, the monitoring adult does not need to be named in the pupil's care plan, but the arrangement should be understood and agreed as part of routine procedure.

Any changes to a care plan, even temporary, must be documented in writing without delay. A signed record should be kept of all intimate and personal care tasks, including times the adult(s) left and returned to the room if carried out elsewhere.

13. Medication

13.1 Adults taking medication that may affect their ability to care for children should seek medical advice regarding their suitability to do so and should not work with pupils whilst taking medication unless medical advice confirms that they are able to do so. Adult medication on the premises must be securely stored out of the reach of children.



14. Honesty and integrity

14.1 Staff must be honest and act with integrity in their work. This includes the handling and claiming of money and the use of Company property and facilities.

14.2 All staff must comply with the Bribery Act 2010. For further information see the Company's Anti-Bribery and Corruption Policy.

14.3 Gifts from suppliers or associates of the Company must be declared to your Line Manager, with the exception of "one off" token gifts from pupils or parents.

14.4 Personal gifts to individual pupils or their families/carers should not be given, as they may be misinterpreted as attempts to bribe, groom, or seek favour. However, small, low-value items given to a whole class may be appropriate if they are inclusive in nature and clearly intended as a gesture of appreciation. These should be proportionate, non-preferential, and aligned with the ethos of the Company.

14.5 Staff must ensure that they use funds and assets entrusted to them in a responsible and lawful manner. They should strive to ensure value for money for the pupils and must notify the Group Operations Director (or the Managing Director) of any actual or potential unlawful decisions or expenditure or any other financial irregularity.

15. Conduct outside of work

15.1 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Company or the employee's own reputation or the reputation of other members of the Company.

15.6 This includes social events, work-related gatherings, and personal group chats that involve colleagues. Even when participation is optional or outside of work hours, employees are expected to act in a way that reflects the company's values and maintains a safe and inclusive environment.

- **Social events:** whether organised by the company or informally amongst staff, everyone should feel welcome, respected, and safe. Bullying, harassment, sexual harassment, excessive pressure to take part in certain activities, or behaviour that could harm the reputation of the company is not acceptable.
- **Group chats and online spaces:** Conversations in personal group chats that include colleagues should remain respectful and appropriate. Sharing offensive, discriminatory, or exclusionary content, or using such spaces to gossip or target individuals, will not be tolerated.
- **Personal responsibility:** Remember that what is said or done outside of work can still affect working relationships and the wider culture of the company. If in doubt, treat colleagues in the same way you would in a professional setting.

15.7 In particular, criminal offences which involve violence or possession or use of illegal drugs or sexual misconduct are unacceptable. Staff cautioned for, charged or convicted of a criminal offence following their appointment to the post must disclose/report this to the HR Manager. Consideration will then be given to the effect of the charge or the conviction and the suitability of staff to do the job.

15.8 Staff may undertake work in addition to Oak Activities work with the agreement of the Group Operations Director or Business Development and Compliance Director, provided that it does not conflict with the interests of the Company.

15.9 Where staff wish to undertake work during termtime and this meets the needs of the Company, this must be authorised and agreed by the Group Operations Manager or Business Development and Compliance Director.



15.10 It is not appropriate for staff to have social contact with current or former Oak Activities pupils that is not declared to the Group Operations Director or Business Development and Compliance Director.

16. Social Media

16.1 All communication between adults and pupils must remain within clear, professional boundaries at all times. This includes the use of all forms of technology, such as mobile phones, tablets, text messages, emails, instant messages, websites, and social media platforms (e.g. Facebook, Instagram, Twitter, WhatsApp, Snapchat, and similar apps), as well as forums, blogs, gaming sites, and video or image-sharing tools.

16.2 Adults must not communicate with pupils via personal social media accounts, nor should they accept or initiate friend or follower requests or engage in messaging through such platforms. Communication should only take place through school-approved channels and systems, and only for legitimate professional reasons.

16.3 Adults must not share or request personal information with or from pupils, except where it is necessary and appropriate to their professional role. All communication must be transparent, professional, and should never give rise to perceptions of favouritism, personal familiarity, or grooming behaviour.

16.3 Staff are strongly advised to make their personal social media accounts are set to the highest privacy settings to ensure pupils cannot access personal information.

16.4 Staff must not engage in any use of social network sites which may bring themselves or the Company into disrepute.

16.5 Staff must not accept “friend” or “follow” requests from current or former pupils. If a member of staff becomes aware that a colleague has accepted such a request from a current or former pupil, this must be raised to the senior leadership team and can be done so via the Whistleblowing policy and procedure.

16.6 As social media content can be publicly accessible and long-lasting, adults are personally responsible for what they share. Online activity — including posts, comments, and profile images — should not undermine confidence in their suitability to work with children and young people. Even if an account includes a disclaimer that views are personal, material that is inconsistent with the values and expectations of the Company may still result in reputational or disciplinary consequences.

17. Use of personal mobile phones, laptops, and tablets

17.1 Such items should not normally be taken into the teaching areas. Such personal equipment is not to be used at any time, unless agreed by your line manager, during contact with pupils (i.e. awaiting a medical appointment).

18. Photography, Videos, and other Creative Arts

18.1 Many educational activities involve the taking or recording of images. This may be undertaken as part of the curriculum, for displays, publicity, to celebrate achievement or, to provide evidence of the activity.

18.2 An image of a child is personal data, and it is, therefore, a requirement under Data Protection Legislation that explicit consent is obtained from the parent/carer of a child before any images are made such as those used for Oak Activities websites, notice boards, productions, or other purposes, unless an alternative legal justification for processing this data is applicable.

18.3 Adults need to be aware of the potential for such images to be taken and/or misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. There should be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

18.4 Adults should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to consider the wishes of the child, remembering that some children do not wish to have their photographs taken.

18.5 Adults should only use equipment provided or authorised by the Oak Activities to make/take images and should not use personal equipment, mobile telephones, or any other similar devices to make/take images.

18.6 The following guidance should be followed:

- If a photograph is used, avoid naming the pupil.
- If the pupil is named, avoid using the photograph.
- Photographs/images must be securely stored and used only by those authorised to do so.
- Be clear about the purpose of the activity and about what will happen to the photographs/images when the lesson/activity is concluded.
- Only retain images when there is a clear and agreed purpose for doing so.
- Ensure that an Alternative Provision Manager is aware that the photography/image equipment is being used and for what purpose.
- Ensure that all photographs/images are available for scrutiny to screen for acceptability.
- Be able to justify the photographs/images made.
- Do not take images of pupils for personal use.
- Only take images where the pupil consents to this and, where the pupil is under the age of 18, where parental or carer consent has also been obtained.
- Do not take photographs in one-to-one situations.
- Do not display or distribute photographs/images of pupils unless there is consented to do so from the parent/carer.
- Only publish images of pupils where they and their parent/carer have given explicit written consent to do so.
- Do not take images of pupils in a state of undress or semi-undress.
- Do not take images of pupils which could be considered indecent or sexual.
- Do not take images of a child's injury, bruising or similar (e.g., following disclosure of abuse) even if requested by children's social care.
- Do not make audio recordings of a child's disclosure.



19. Transporting Pupils

19.1 In certain situations, e.g., trips, adults may agree to transport pupils. Transport arrangements should be made in advance by a designated Oak Activities Alternative Provision Manager who will be responsible for planning and overseeing all transport arrangements and responding to any concerns that may arise. If agreed by the Senior Leadership Team, transport should only be provided in vehicles for agreed activities such as 'trips'. The information for risk assessing trips can be found in the Company's Educational, Trips, and Visits Policy.

19.2 Oak Activities require staff to ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded. It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. The driver should be aware of the current legislation concerning the use of car seats for younger children where applicable. It is illegal to drive using hand-held phones or similar devices and the driver must ensure that they adhere to all driving regulations.

19.3 It is inappropriate for adults to offer lifts to a pupil unless the arrangement has been agreed in advance with a senior leader and, where it falls outside their normal working duties, with the pupil's parent or carer. Where such arrangements are approved, the following conditions must be met to ensure safety and compliance with legal and safeguarding requirements:

- The driver must hold a full, clean driving licence.
- The vehicle must be roadworthy, appropriately taxed and insured for business use.
- A current MOT certificate must be in place where applicable.
- The vehicle must be fitted with legally compliant and age-appropriate car seats or restraints where required.
- Wherever possible, two members of staff should be present in the vehicle to safeguard both the pupil and the adult.
- These safeguards are designed to protect pupils, staff and the reputation of the Oak Activities. Any deviation from this guidance must be authorised by senior leadership and risk-assessed accordingly.

19.4 There may be occasions where a pupil requires transport in an emergency or where not to give a lift may place a pupil at risk. Such circumstances must always be recorded and reported to a senior leader and parents/carers.

20. Use of Company premises or facilities for work not connected with Oak Activities

20.1 Staff must not use the Company's premises or facilities for activities which are not connected with their employment at Oak Activities, without agreement from their line manager. This includes the personal use of Company email, telephones, computers, photocopiers, or other equipment.

20.2 Internal email systems and Company computer equipment should always be used in accordance with the appropriate Company policies.

21. Confidentiality

21.1 Where staff have access to confidential information about pupils or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil.



21.2 All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate Company procedure.

21.3 It must not be discussed outside the school, including with the pupil's parent or carer, nor with colleagues in the school except with a senior member of staff with the appropriate role and authority to deal with the matter.

21.4 However, staff have an obligation to share with their manager or the Company's Designated Safeguarding Officer any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not pass on information that they are told by the pupil.

22. Data

22.1 As data controllers, all Oak Activities is subject to the General Data Protection Regulation (GDPR) and Data Protection Act 2018 ("Data Protection Legislation"). In addition, Oak Activities staff owe a common law duty of care to safeguard the welfare of their pupils. This duty is acknowledged in the provisions governing disclosure of information about pupils.

22.2 Adults may have access to special category personal data about pupils and their families, which must be kept confidential at all times and only shared when legally permissible to do so and in the interests of the child. Records should only be shared with those who have a legitimate professional need to see them. In circumstances where special category personal data needs to be shared, the Data Protection Legislation contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent. In such cases, adults have a duty to pass the information on without delay to those with designated safeguarding responsibilities.

22.3 Confidential or personal information about a pupil or their family must never be disclosed to anyone other than on a need-to-know basis and advice should be sought prior to disclosure to ensure such disclosure is in accordance with the Data Protection Legislation. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. The information must never be used to intimidate, humiliate, or embarrass the pupil. The information must never be used by anyone for their own or others advantage (including that of partners, friend's relatives or other organisations).

22.4 Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the Oak Activities site other than on security protected Oak Activities equipment. The information must only be stored for the length of time necessary to discharge the task for which it is required in line with Oak Activities Data Protection Policy. If a pupil or parent/carers makes a disclosure regarding abuse or neglect, the adult must follow the School's procedures and the guidance as set out in 'Keeping Children Safe in Education' DfE. Confidentiality must not be promised to the pupil or parent/carers, however, reassurance should be given that the information will be treated sensitively.

If an adult is in any doubt about the storage or sharing of information, they must seek guidance from the Designated Safeguarding Lead and the Company's Data Protection Officer, Michael Kaoura (michael.kaoura@oakactivities.com), for data breaches. Any media or legal enquiries must be passed to senior leadership.



23. Intellectual Property

The ideas, designs, software, materials, and other work you work create or use as part of your job are part of the Company's intellectual property (IP). This means they belong to the company, not to individuals. We ask everyone to use these resources responsibly and only for work purposes.

Please do not share, copy, or use company IP for personal projects or outside work, unless you have written permission from the Managing Director. For example, sharing internal documents with friends or using files for private tutoring would be a misuse of company IP.

Protecting our IP helps keep the company, and everyone's work, safe and valued.