Staff Code of Conduct

Compass Learning & Education

September 2026

Policy owner: Rosie Aylward
Designated Safeguarding Lead: Rosie Aylward
Review cycle: Annual or earlier if required
Next scheduled review: September 2027

1 Purpose and scope

This Code sets out the standards expected of all Compass staff when teaching, mentoring, providing therapeutic support or undertaking other work for Compass Learning & Education. It applies across homes, schools, community venues, hired premises, work experience and online delivery, and to relevant volunteers, agency staff and contractors.

Our learners may experience SEND, SEMH needs, disrupted education, anxiety, exploitation or other vulnerabilities. Staff must build dependable professional relationships while maintaining clear boundaries, promoting dignity and responding promptly to risk. Warmth and appropriate reassurance are encouraged; secrecy, dependency and personal relationships are not.

The Code adopts the relevant expectations of Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. Applicable equality, safeguarding, health and safety and data-protection duties must be observed. School-specific powers and duties are not assumed to apply automatically to every Compass activity. This Code operates alongside the Safer Recruitment Policy, Safeguarding and Child Protection Policy, behaviour and restrictive-intervention procedures, low-level concerns and whistleblowing arrangements, and data-protection policies.

Staff must follow the Code in their professional work. Conduct outside work must also be reported where it may affect suitability to work with learners. Support for adults aged 18 or over must follow the relevant adult safeguarding arrangements; an EHCP does not extend the legal definition of a child beyond age 17.

2 Readiness for an assignment

No student-facing assignment may begin until Compass has completed and approved the required recruitment checks and the staff member has completed induction. This applies to supervised as well as unsupervised work and is consistent with the Safer Recruitment Policy. Staff must not appoint a substitute or delegate their assignment without Compass's prior approval and completion of the required checks.

All staff must read and confirm their understanding of KCSIE 2026 Part One in full, this Code and Compass's safeguarding procedures, and complete Prevent Duty training. The Part One overview is a supporting resource, not a replacement. Induction must cover the reporting system, DSL and cover arrangements, absence and missing-learner response, online safety and relevant filtering and monitoring responsibilities. A minimum one-hour organisational induction does not replace additional role-specific preparation.

Before each assignment, staff must understand the agreed objectives, location, timetable, learner support and risk plans, emergency contacts and handover arrangements. They must know the provision they are responsible for delivering and identify any missing information or training before the session. Compass will provide regularly updated safeguarding training and at least annual updates; staff must complete the annual safeguarding refresher and other training required by Compass for their role.

3 Safeguarding reporting and professional curiosity

Staff must recognise abuse, neglect and exploitation in person and online, including child-on-child abuse, sexual harassment and violence, domestic abuse, criminal and sexual exploitation, modern slavery and radicalisation. SEND or distress must not be used to explain away signs of harm. Staff should adapt communication so learners can express concerns and must not assume that a child will make a direct disclosure.

A concern about a learner must be reported promptly to the DSL or safeguarding cover using the approved route. Staff must listen, avoid leading questions, record the learner's words accurately and explain that information may need to be shared to keep them safe. They must not promise secrecy, investigate the allegation themselves or delay reporting while collecting proof.

Where there is immediate danger, staff must call 999. If safeguarding cover is unavailable, staff must take necessary protective action and contact children's social care or police directly as appropriate, then inform Compass as soon as possible. A concern must not wait until the end of an assignment, the next working day or a scheduled supervision meeting. Staff must escalate if a response does not adequately address the risk.

Records must be factual, dated and made without delay through Compass's secure system. Urgent verbal reporting must be followed by the written record. Personal notes must not become a parallel safeguarding file. In school-based assignments, relevant information must reach both Compass and the school's safeguarding lead under the agreed arrangements; staff must not assume that one organisation has told the other.

Concerns about adults

All concerns about adult conduct, including self-reported errors or situations that could be misinterpreted, must be shared promptly. A low-level concern is conduct inconsistent with this Code which does not meet the harm threshold; it is not an insignificant concern. Reports will be handled sensitively, recorded and reviewed for patterns, with proportionate support or action. Where the threshold is unclear, Compass will seek LADO advice.

Allegations that an adult has harmed or may harm a child, may have committed a relevant offence, may pose a risk or may be unsuitable to work with children must be reported immediately to the Director unless the Director is implicated. The case manager will consult the LADO without delay and before undertaking a substantive investigation, while securing immediate safety and preserving relevant evidence. Suspension is not an automatic response and alternatives will be considered where safe.

A concern about the Director must not be investigated or decided by the Director. Staff must use the independent reporting contact identified on the current safeguarding contact sheet. Where an allegation may meet the harm threshold, or there is a conflict of interest in internal reporting, staff may contact the relevant LADO directly without permission. The absence of an independent contact must never prevent an external safeguarding report.

Compass will give staff current DSL, safeguarding-cover, independent reporting and external contact details before deployment. For work across local authorities, Compass will identify the relevant reporting arrangements for the assignment. Staff should use the NSPCC whistleblowing advice service or another appropriate external route where they cannot safely raise a safeguarding failure internally.

4 Professional relationships and boundaries

Appropriate Professional Relationships

Staff must treat learners with respect, remain predictable and reliable, and maintain the distinction between a supportive professional relationship and friendship. Staff must maintain appropriate professional boundaries with all learners. They must not engage in romantic, sexual or sexualised behaviour towards a learner, or use their position to develop an intimate or otherwise inappropriate personal relationship. This applies regardless of the learner's age or any apparent consent. Any concern about inappropriate intimate or sexual conduct towards a learner must be reported immediately through Compass's safeguarding procedures. Where a criminal offence is suspected, Compass will report the matter to the police and notify the LADO where the concern involves a child. Referrals will not be delayed pending an internal investigation. Immediate danger must be reported by calling 999.

Any proposed or unexpected personal contact with a former learner which could raise a boundary concern must be referred to the Director before engagement, or reported promptly if already received.

Staff must disclose pre-existing relationships with learners or families, family friendships, outside interests and other conflicts which may affect the assignment. They must not arrange additional private work with a Compass family outside the agreed Compass process, recruit learners for another business through their role, or use access to families for personal benefit.

Staff must not lend or borrow money, sell personal goods to learners, give private gifts, or exchange personal items. Gifts from learners, families or suppliers must not be accepted.

Communication Channels & Social Media

Communication must use approved Compass channels and agreed contact times. Staff must not share personal phone numbers, private email addresses or social-media details with learners. Unexpected contact through a personal account must not develop into a conversation: preserve necessary evidence, report it and redirect through an approved route. Where urgent action is needed to protect someone, take that action and report the circumstances immediately afterwards.

Staff must not friend, follow or privately message current learners through personal social media, gaming services or private apps. Personal contact with former learners under 18 is also prohibited. Public content, privacy settings and online interactions must be managed with professional boundaries in mind. Learners must never be asked to conceal contact from Compass, their carers or safeguarding professionals.

Language and communication

Compass staff must use respectful, professional and age-appropriate language when communicating with learners, families, colleagues and other professionals. Staff must not swear, use offensive or discriminatory language, make sexualised comments or jokes, or use language that humiliates, threatens, belittles or intimidates. This applies to spoken, written and online communication, including language presented as humour or "banter".

Staff must remain calm when responding to challenging behaviour and must not mirror a learner's swearing or aggression. Communication should take account of the learner's age, understanding and SEND needs, with clear explanations and respectful correction where required.

5 Dress Code and Identification

Compass staff must dress professionally and appropriately for their role, the setting and the activities being delivered. Clothing should be clean, comfortable and suitable for working with children and young people, allowing staff to move safely and undertake their duties. Footwear, jewellery and accessories must not create a safety risk. Appropriate protective clothing and equipment must be worn where required.

Clothing must provide appropriate coverage when standing, sitting, bending or moving during activities. Items that are excessively revealing, transparent or expose underwear are not suitable for work. This expectation applies consistently to all Compass staff.

Clothing must not display offensive, discriminatory or inappropriate words or images. Compass respects religious and cultural dress and will make reasonable adjustments for disability, health needs and other individual circumstances, while maintaining necessary safety standards.

A current Compass ID badge must always be worn and clearly visible while undertaking Compass duties, including in schools, learners' homes and community venues. A safety-release lanyard or secure clip must be used as appropriate to the activity and risk assessment. Staff must report a lost or damaged badge immediately and arrange temporary identification with Compass before their next assignment.

6 Safe delivery in homes and the community

One-to-one work must be authorised, planned and risk assessed. The location and timing must be known to Compass, with a check-in and check-out arrangement and a clear response to missed contact. Staff must have access to a working phone, emergency contacts and relevant learner information. A changed venue, additional activity or material change to the session must be approved before it takes place, except for immediate action needed to prevent harm.

Home visits and lone working

Home-session arrangements must specify who is expected to be present and how the learner and staff member will be safeguarded. An adult-presence requirement will be decided for the individual assignment and recorded; staff must not silently change that arrangement. Sessions should use an agreed suitable shared or professional space. Bedrooms must not be used unless an exceptional arrangement is individually assessed and authorised, for example because of disability or medical needs.

Visibility, privacy and accessibility must be balanced. An open door or visible panel may be appropriate, but confidential therapeutic work may require a private room with alternative safeguards such as a known timetable, agreed adult presence nearby and clear entry and exit arrangements. Privacy must never mean an undisclosed or unaccountable session.

Staff must reassess safety when there are unexpected adults, uncontrolled animals, intoxication, aggression, unsafe equipment or other hazards. They must not enter or continue in an unsafe environment. Where a session is stopped, staff must contact Compass, arrange a safe handover or emergency response as appropriate and record what happened. Staff must not abandon a learner for whom they remain responsible. They are not expected to accept abuse or violence as part of their role.

Community activities and handovers

Activities must follow the approved risk assessment, staffing arrangements, accessibility plan and consent requirements. Staff must know collection arrangements and who is authorised to receive the learner. The presence of library, leisure-centre, farm or venue staff does not transfer Compass's supervision responsibility to them.

Staff must record attendance accurately and report non-attendance, unexpected absence, lateness or a learner leaving a session through the agreed procedure promptly. A missed session must not simply be recorded as a cancellation where welfare is uncertain. If a learner cannot be located or there is an immediate concern, staff must activate the missing-learner and emergency arrangements.

Staff must not independently cancel, relocate, shorten or extend an assignment without informing Compass and obtaining approval where required. Families and commissioners must receive accurate information through the agreed communication route. Any incomplete handover must be escalated before staff leave.

Transport

Personal vehicles may be used to transport learners only with prior Compass approval, an individual risk assessment, appropriate consent and confirmed licence, vehicle, insurance and restraint arrangements. Business use and cover for the intended transport must be confirmed. Journeys, collection points, passengers and emergency arrangements must be agreed. Informal lifts, personal detours and unapproved passengers are prohibited. Staff must never use a hand-held phone while driving or leave a learner unattended in a vehicle.

Staff should never transport a learner in their personal vehicle without the above having been confirmed in writing.

7 Teaching mentoring and therapeutic practice

Staff must deliver the agreed provision within their qualifications and competence. They must implement the learner strategies and EHCP provision allocated to Compass, record progress honestly and report barriers or unmet needs. Staff must not promise outcomes, diagnose a condition, alter an EHCP or commit Compass to additional provision without authority.

Mentoring may support confidence, engagement and wellbeing, but must not be presented as clinical treatment. Mentors must not undertake therapy for which they are not appropriately qualified. Staff must refer concerns beyond their competence to the appropriate Compass lead and seek specialist support rather than improvise treatment.

Learners must be treated fairly, with reasonable adjustments and communication suited to their needs. Staff must challenge discrimination, bullying and degrading language and respond to prejudice as a potential safeguarding issue. Distress or disability must not be punished as deliberate misconduct without appropriate consideration. Staff must not humiliate, threaten, retaliate, use sarcasm to shame, or impose unauthorised sanctions. Respectful restorative work and individual support plans should guide responses.

Therapeutic Practice

Therapeutic staff must maintain the registration or membership category, insurance and supervision appropriate to their work, comply with relevant professional standards, and report restrictions or changes promptly. Before intervention begins, the agreed consent and capacity arrangements, goals, confidentiality limits and information-sharing approach must be clear to the learner and relevant adults. Staff must not promise absolute confidentiality or allow professional confidentiality to prevent a necessary safeguarding report.

Therapy records must be kept through agreed secure arrangements. Full clinical notes must not automatically be shared with tutors, parents or commissioners; necessary information must be shared lawfully and proportionately. Supervision discussions must protect identity where possible. Record ownership, access and secure transfer at the end of an assignment must follow the agreed service arrangements.

8 Physical contact health and safety

Supportive contact must meet a legitimate need and be appropriate to the learner's age, understanding, wishes, culture and circumstances. Staff should explain what they are doing and seek agreement where appropriate. First aid, personal care and therapeutic touch require the relevant competence and agreed arrangements. Contact must never be secretive, sexualised, punitive or for the adult's emotional benefit. Any contact that causes concern or could be misunderstood must be reported and recorded.

Restrictive intervention

Prevention, communication and de-escalation must be prioritised. Staff must follow Compass's separate restrictive-intervention procedure and the learner's plan, and must not assume that powers available to school staff automatically apply in a home or community assignment. Any use of force must have a lawful basis and be necessary and proportionate to the circumstances. Force must never be used as punishment, for staff convenience or simply to compel participation in a session.

Planned restrictive techniques may only be used by appropriately trained and authorised staff under the agreed procedure. An immediate emergency may require lawful protective action; staff must summon assistance and use no more intervention than is necessary. Staff must not improvise unsafe holds, obstruct breathing or lock a learner in a room. Compass does not authorise staff to use seclusion during outreach sessions.

Every restrictive intervention must be reported to Compass immediately and recorded promptly, including its circumstances, alternatives attempted, duration, people involved and any injury. Immediate welfare and medical needs must be addressed. Parent, commissioner and external notifications must follow the safeguarding and incident procedure, including applicable recording and reporting duties. Compass will review the incident with the learner and staff, adapt plans and consider whether it raises an allegation or further safeguarding concern.

Safe activities and care

Staff must read the applicable risk assessments, check the environment and equipment, maintain agreed supervision and stop an activity where it is unsafe. Cooking, sport, animal-related activity, salon work and work experience require activity-specific competence, equipment and controls. Personal equipment must not be introduced without approval. Venue procedures, emergency exits, first-aid arrangements and relevant allergies must be understood before delivery.

Medication, intimate care and other personal care may only be provided under an authorised individual plan by staff with the necessary preparation. Medication must not be offered informally or shared. Staff must record and report accidents, injuries, near misses, unsafe equipment and hazards promptly. Compass will determine any statutory reporting requirement; staff must supply accurate information and preserve relevant evidence.

9 Digital working information and images

Staff must use approved Compass accounts and platforms for professional communication and learner information. Access must be limited to the learners and records needed for the role. Where authorised Microsoft 365 and SharePoint arrangements are used, staff must use their own allocated account, multifactor authentication and the permissions provided. Credentials must never be shared.

Approved personal devices must have appropriate access protection, supported and updated software and screen locking. Household members must not access Compass information. Learner records must not be copied to personal email, messaging accounts, unapproved storage or removable media. Local downloads or offline copies require specific approval and appropriate protection. Paper information must be minimised, secured in transit and storage, and disposed of through approved arrangements.

Confidential matters may be discussed through authorised secure channels where necessary for the role. They must not be discussed in public, on personal social media or with unauthorised people. Verify recipients before sharing. Staff must use the organisation's agreed information-sharing arrangements rather than select a lawful basis for themselves. Data protection does not prevent necessary, lawful safeguarding sharing.

Staff must report suspected data breaches immediately, including lost paperwork, a misdirected message, compromised credentials or a lost device with access to Compass systems. They must not delete evidence or attempt to conceal an error. The Director or data-protection lead will coordinate containment and any required notifications.

Online sessions and emerging technology

Online sessions must use approved platforms, access controls and agreed participants. Staff should work from a private, suitable space with a professional background and prevent others overhearing. Session links must not be made public. Relevant filtering, monitoring and platform safety controls must not be bypassed. Staff must not open private side channels with learners.

Staff must know the learner's agreed location and emergency contact arrangements for remote sessions. Unexpected participants, unsafe behaviour, harmful content or a disconnection following a concerning disclosure must be addressed through the agreed safeguarding response. Ending a call does not end the duty to report or take necessary protective action.

Photography, audio recording, video recording, screenshots and automated transcription require prior Compass authorisation, a defined purpose and appropriate privacy and consent arrangements. Images must not be taken on personal devices. Session recording is not the default and may not be introduced by an individual member of staff. Approved recordings must follow specified access, retention and deletion arrangements.

Identifiable learner details, safeguarding records, EHCPs and therapy notes must not be entered into unapproved AI services. AI-generated materials must be checked for accuracy, bias and suitability before use. Staff must not use AI to make safeguarding or clinical decisions, fabricate reports, or create or circulate sexualised, humiliating or misleading images of learners or colleagues.

10 Professional judgement public expression and fitness

Staff must be honest and accurate in attendance, session reports, assessment, expenses, invoices and communications with families and commissioners. Records must not be backdated misleadingly, exaggerated or fabricated. Staff must identify errors and correct them transparently. Concerns about a colleague must be raised through the appropriate route, without gossip, intimidation or retaliation.

Staff must dress safely and appropriately for their duties and the setting, respecting dignity and equality. Clothing or behaviour must not display offensive, discriminatory or extremist messages. Staff must not attend work impaired by alcohol, drugs or medication. They must report a functional limitation that may affect safe work and seek advice or adjustments; a diagnosis or disability alone does not establish unsuitability.

Absence, illness or delay affecting a session must be reported promptly through the agreed Compass contact route and before the session wherever reasonably possible. Staff must state the likely impact and expected duration if known. They must not leave a learner or family expecting a session without notifying Compass. Employee sickness certification and other contractual reporting requirements apply through the relevant agreement.

Political impartiality and beliefs

Staff must not use their role to pressure learners into supporting a political party, campaign, religious or other personal belief, or present contested political opinions as established fact. Age-appropriate discussion and balanced exploration of political issues are permitted within the agreed curriculum. Staff must respect learners' developing views and must not exploit vulnerability or professional influence.

Promoting equality, challenging discrimination and explaining the law do not require staff to give equal weight to abusive or factually unsupported views. Religion, belief and lawful political expression must be treated respectfully. Private lawful expression is not automatically prohibited because a person works for Compass; staff must nevertheless preserve confidentiality, avoid harassment and make clear when they are not speaking for Compass.

Staff must follow the agreed Prevent arrangements and report relevant safeguarding concerns about susceptibility to radicalisation. Lawful criticism, religious observance or political disagreement must not by itself be treated as evidence of extremism. Staff must complete role-appropriate Prevent training and updates required by Compass.

11 Accountability support and review

Staff must promptly disclose new information relevant to their lawful eligibility or suitability, including applicable barred status, professional restrictions or sanctions. Compass will only require information it is legally entitled to consider and will assess it fairly under the Safer Recruitment Policy. Staff must cooperate with appropriate supervision, observation, professional development and safeguarding enquiries and keep required qualifications and professional status current.

Compass encourages self-reporting and reasonable concerns raised in the public interest. Staff must not suffer retaliation for raising a concern honestly or making a protected disclosure. Confidentiality and reputation clauses must not obstruct safeguarding reports, lawful whistleblowing or cooperation with authorities. External routes include the LADO for relevant allegations, police or social care for immediate safeguarding concerns, and the NSPCC whistleblowing advice service; other regulators should be contacted where their remit applies.

Breaches will be addressed fairly and proportionately. Action may include advice, training, closer supervision, removal from an assignment, employee disciplinary action or ending an engagement under the applicable arrangements. Relevant safeguarding referrals will be made where their criteria are met. A code breach does not automatically meet the DBS referral threshold, and resignation or the end of an assignment does not remove a legal duty to refer. Relevant teacher or professional-regulator referrals will also be considered.

The Director will review this Code annually, or sooner following changes to guidance, delivery, legislation or learning from incidents. Staff will be informed of material changes and must confirm understanding. Before the Code is issued, Compass must complete its approval record and current reporting contact sheet, including safeguarding cover and an independent reporting route.

12 Staff declaration

I confirm that I have read and understood this Code, know how to access the supporting policies and current safeguarding contact details, and will follow the standards relevant to my role. I understand my responsibility to report safeguarding concerns, including concerns about adults, and to seek clarification when uncertain. I understand that breaches may lead to proportionate action under the applicable arrangements and safeguarding referrals where required.

Name: _____

Role: _____

Signature: _____

Date: _____

13 Reference guidance

Keeping Children Safe in Education 2026, particularly Parts One and Four; Working Together to Safeguard Children 2026; DfE guidance on restrictive interventions effective from 1 April 2026; and DfE political impartiality guidance inform this Code. Compass's requirements for deployment approval, induction and safe outreach delivery are organisational safeguards. Staff should use the current versions of the linked guidance alongside Compass's procedures.

KCSIE 2026: Read guidance

Working Together to Safeguard Children: Read guidance

Restrictive interventions guidance: Read guidance