

Department	Language in Action	Implementation Date	15 th May 2026
Official name of the policy	Staff Code of Conduct for Working with Under-18s (v1.0)	Last Reviewed/Update Date	15 th May 2026
Policy Owner	Adam Ennis (Head of Juniors)	Approval Date	15 th May 2026
Policy Approver	Emiliano Sallustri (Managing Director ELT – Designated Safeguarding Lead)	Next Review	15 th May 2027

Staff Code of Conduct for Working with Under-18s

1. Purpose and Scope

This Code of Conduct sets out the standards of behaviour expected of all Language in Action (LiA) staff, and anyone engaged by LiA, when working with students under the age of 18. It applies to all settings — classrooms, residential accommodation, excursions, activities, transfers and online — and at all times during the programme, whether on or off duty.

It supplements the Malvern International Conduct and Standards Policy and operates under the Group Safeguarding and Prevent Policy and the LiA Safeguarding & Prevent Operational Implementation Addendum. Agency group leaders are subject to their own Code of Conduct, signed on arrival, which is aligned with this document.

2. Position of Trust

All LiA staff are in a position of trust in relation to the students in their care. Staff must never use their position to build inappropriate relationships with students, and must act, and be seen to act, in the best interests of every student at all times. All staff sign a Suitability to Work with Children Declaration before starting work and complete safeguarding training at the level required for their role before working with students.

3. Standards of Conduct

All staff working with under-18s must observe the following standards:

- **Physical contact:** keep physical contact to the minimum appropriate to the situation (e.g. first aid, safety). Never use physical contact as punishment, play-fighting or horseplay.
- **One-to-one situations:** avoid being alone with a student in an unobserved or closed-door setting. Where a private conversation is needed, use a visible or open space; for any formal conversation with an under-18, a second adult must be present.
- **Student bedrooms:** do not enter student bedrooms alone except in an emergency or clear welfare need; wherever possible another member of staff should be present or informed.
- **Communication:** communicate with students only through official LiA channels. Never share personal phone numbers, e-mail addresses or personal social media accounts with students, and do not accept or send friend/follow requests on personal accounts.
- **Images:** take photographs or videos of students only where permitted, on authorised devices and through official channels, in line with the E-Safety and Cyber-Bullying Policy and consent arrangements.
- **Gifts and favouritism:** do not give personal gifts to individual students or show favouritism; any reward must be part of the open programme.
- **Contact outside the programme:** do not arrange to meet students outside the programme or maintain contact with students after the programme ends.
- **Alcohol, smoking and drugs:** never be under the influence of alcohol or drugs while responsible for students, in line with the Drug and Alcohol Policy; do not smoke or vape in the presence of students.
- **Language and behaviour:** use appropriate language at all times; never make suggestive, discriminatory or demeaning remarks to or about a student, even in jest.

4. Reporting Concerns and Allegations

Any concern about the behaviour of a member of staff towards a student — including low-level concerns — must be reported without delay through the safeguarding escalation chain set out in the LiA Safeguarding Addendum (Section 8): centre Deputy DSL, then the LiA Designated Safeguarding Lead. Concerns must never be managed informally at centre level.

Allegations that a member of staff may have harmed a child, or behaved in a way that indicates they may pose a risk of harm, are handled by the DSL, who refers to the relevant Local Authority Designated Officer (LADO) within one working day where the harm threshold is met, in line with the LiA Safeguarding Addendum and KCSIE 2025. Staff may also use the Public Interest Disclosure (Whistleblowing) Policy where they feel a concern is not being addressed.

Staff must report to the DSL, without delay, anything in their own life that affects their suitability to work with children (including cautions, charges or convictions arising during employment).

5. Breaches of this Code

A breach of this Code is a disciplinary matter and will be handled under the Malvern International disciplinary procedure; serious breaches may constitute gross misconduct and lead to dismissal and, where relevant, referral to statutory agencies and the Disclosure and Barring Service.

6. Related Documents

- Group Safeguarding and Prevent Policy and LiA Safeguarding & Prevent Operational Implementation Addendum
- Conduct and Standards Policy
- E-Safety and Cyber-Bullying Policy and Procedure
- Drug and Alcohol Policy
- Public Interest Disclosure (Whistleblowing) Policy
- Suitability to Work with Children Declaration