APEX2100

STAFF CODE OF CONDUCT & PROFESSIONAL BOUNDARIES POLICY

Academic Year: 2026–2027
Policy Owner: Apex2100 Education Board
Operational Owner: Designated Safeguarding Lead (DSL)
Designated Safeguarding Lead: Dave Breen
Deputy Designated Safeguarding Leads (DDSLs): Karen Thomas, Stuart Terris and Mark Tilston
Designated Safeguarding Governor / Board Lead: Mike Buchanan
Review Frequency: At least annually and sooner where legislation, statutory guidance or organisational arrangements change
Presented to Board: September 2026
Next Scheduled Review: September 2027

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1. Policy Statement

Apex 2100 recognises that maintaining appropriate professional boundaries between adults and children is fundamental to safeguarding.
All employees, volunteers, governors, contractors, consultants, coaches, agency workers, visiting professionals and other adults working with or on behalf of Apex2100 are expected to maintain high standards of professional conduct.
Adults working with children hold a position of trust. That position must never be used to:

- Exploit a child.
- Manipulate a child.
- Intimidate a child.
- Obtain inappropriate access to a child.
- Develop an inappropriate relationship.
- Obtain personal, financial or sexual benefit.
- Circumvent safeguarding procedures.
- Place a child at unnecessary risk.

This Code establishes the standards expected of adults working for or on behalf of Apex2100.
Failure to comply may result in:

- Safeguarding action.
- Management action.
- Disciplinary action.
- Referral to external agencies.
- Other appropriate action.

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2. Purpose

The purpose of this policy is to:

- Establish clear professional standards.
- Protect children from inappropriate adult behaviour.
- Protect staff from misunderstandings and allegations.

- Establish clear professional boundaries.
- Provide guidance on appropriate communication.
- Regulate contact between staff and students.
- Support a culture in which concerns can be raised.
- Identify behaviours that may constitute low-level concerns.
- Provide a basis for disciplinary and safeguarding action where necessary.
- Support consistent safeguarding practice across Apex2100 environments.

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3. Scope
This Code applies to:

- Employees.
- Teachers.
- Tutors.
- Coaches.
- Volunteers.
- Governors.
- Contractors.
- Consultants.
- Agency workers.
- Temporary workers.
- Supply staff.
- Residential staff.
- Drivers.
- Visiting professionals.
- Work-experience personnel.
- Placement supervisors.
- Any other adult who has contact with Apex2100 students.

The Code applies whether contact takes place:

- On Apex 2100 premises.
- In residential accommodation.
- During travel.
- On educational visits.
- During sporting activities.
- During social activities.
- Online.
- Through messaging platforms.
- Through social media.
- By telephone.
- In any other context connected with Apex2100.

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4. Position of Trust
Adults working with children must recognise the inherent power imbalance between adults and students.
A student may:

- Look to an adult for support.
- Depend on an adult for educational or pastoral assistance.

- Trust an adult with personal information.
- Perceive an adult as an authority figure.
- Be unable to recognise inappropriate behaviour.

Adults must therefore exercise particular care when forming relationships with students.
The existence of a friendly or trusting relationship does not remove the requirement for professional boundaries.

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5. Core Principles
All adults working with students must:

- Put the welfare and safety of children first.
- Maintain professional boundaries.
- Treat students with dignity and respect.
- Avoid favouritism.
- Avoid behaviour that could reasonably be interpreted as inappropriate.
- Use approved communication systems.
- Report safeguarding concerns promptly.
- Report concerns about colleagues.
- Cooperate with safeguarding investigations.
- Maintain appropriate confidentiality.
- Avoid inappropriate relationships with students.
- Follow Apex2100 policies and procedures.
- Maintain appropriate boundaries outside normal working hours.
- Exercise professional judgement.
- Ask for advice where they are uncertain.

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6. Professional Relationships With Students
Adults must maintain relationships with students that are:

- Professional.
- Respectful.
- Appropriate to the adult's role.
- Transparent.
- Proportionate.
- Capable of being appropriately explained to colleagues, parents, managers or safeguarding professionals.

Adults must not seek to establish relationships with students that are primarily personal rather than professional.
Adults should avoid situations in which a reasonable observer could conclude that an inappropriate relationship is developing.

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7. Favouritism
Staff must treat students fairly and consistently.
Staff must not:

- Give inappropriate gifts.
- Provide preferential treatment.
- Exclude other students without legitimate reason.
- Create special relationships.

- Provide inappropriate financial assistance.
- Give excessive praise or attention.
- Share personal secrets.
- Create exclusive communication channels.
- Otherwise establish inappropriate preferential relationships.

Where additional support is required for a student, it must be based on legitimate educational, safeguarding or welfare needs.

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8. Physical Contact

Physical contact with students must always be appropriate to the circumstances.
Staff should consider:

- The age of the student.
- The student's individual needs.
- SEND or disability.
- Cultural considerations.
- The nature of the activity.
- The student's wishes.
- The safeguarding context.
- Whether the contact is necessary.

Physical contact must never be:

- Sexual.
- Intimate.
- Unnecessarily prolonged.
- Secretive.
- Punitive.
- Intended to satisfy an adult's emotional or physical needs.

Staff should be particularly cautious about physical contact with older students and students who may be vulnerable to misunderstanding or exploitation.

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9. Physical Intervention

Physical intervention must only be used in accordance with Apex2100's Behaviour and Physical Intervention arrangements and applicable law.
Any intervention must be:

- Necessary.
- Reasonable.
- Proportionate.
- Lawful.
- Appropriately recorded.

Staff must report significant physical interventions in accordance with School procedures.

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10. One-to-One Working

One-to-one work with students may sometimes be necessary.
Where reasonably practicable, staff should:

- Use an appropriate professional environment.
- Maintain visibility.
- Use rooms with appropriate safeguarding arrangements.
- Avoid unnecessary closed-door meetings.
- Inform another appropriate adult where appropriate.
- Use approved communication systems.
- Maintain a clear professional purpose.

One-to-one contact must never be used to create secrecy or inappropriate intimacy.
Where a student requests secrecy concerning contact with an adult, the matter should be treated as a potential safeguarding concern.

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11. Private Meetings
Staff should avoid unnecessary private meetings in isolated locations.
Where privacy is necessary because of the sensitive nature of a discussion, staff should consider:

- Whether another appropriate adult should be present.
- Whether the location has appropriate visibility.
- Whether the meeting can take place in an office with suitable safeguarding arrangements.
- Whether the purpose of the meeting is clearly documented.
- Whether the student has an appropriate opportunity to raise concerns.

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12. Personal Contact Details
Staff must not normally provide students with personal:

- Telephone numbers.
- Personal email addresses.
- Home addresses.
- Personal social media accounts.
- Private messaging accounts.
- Other personal contact details.

Where communication is necessary, School-approved communication systems should be used.
Exceptions must have a legitimate professional purpose and be authorised where required.

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13. Messaging Applications
Staff must not use personal messaging applications to develop private or inappropriate relationships with students.
This includes, but is not limited to:

- WhatsApp.
- Snapchat.
- Instagram.
- Facebook Messenger.
- Telegram.
- Signal.
- TikTok messaging.
- Gaming chat.
- Discord.
- Other emerging communication platforms.

Teams is the recommended platform for all communication with athletes:

- Communication must remain professional.
- Appropriate safeguarding arrangements must be maintained.
- Messages should be capable of appropriate oversight.
- Personal conversations should be avoided.

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14. Social Media
Staff must maintain appropriate professional boundaries on social media.
Staff must not:

- Follow or add students to personal social-media accounts where this creates an inappropriate relationship.
- Communicate privately with students through personal social media.
- Post inappropriate content involving students.
- Publish confidential student information.
- Post images of students without appropriate authorisation.
- Make inappropriate comments about students.
- Use social media to criticise or embarrass students.
- Engage in online behaviour that undermines their professional role.

Staff should consider whether their publicly available online activity could reasonably affect their professional suitability or the reputation of Apex2100.

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15. Online Lessons and Digital Communication
Online teaching and communication must follow approved Apex2100 arrangements.
Staff should:

- Use approved platforms.
- Use professional accounts.
- Maintain appropriate backgrounds and environments.
- Dress appropriately.
- Maintain appropriate language.
- Avoid unnecessary one-to-one private communications.
- Follow recording arrangements.
- Follow safeguarding and data-protection requirements.
- Report concerning online behaviour.

Staff must not ask students to move educational conversations to private or unapproved platforms without legitimate reason.

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16. Email
Apex2100 email accounts should be used for professional communication.
Emails to students should:

- Have a legitimate educational or safeguarding purpose.
- Use professional language.
- Avoid unnecessary personal information.
- Avoid inappropriate humour.
- Avoid sexualised or ambiguous language.
- Avoid unnecessary late-night communication.

- Comply with information-security requirements.

Where appropriate, significant communications concerning a student should be copied to, or capable of being accessed by, an appropriate colleague.

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17. Gifts
Staff should not normally give personal gifts to individual students.
Where gifts are provided as part of an approved activity, they should:

- Have a legitimate purpose.
- Be proportionate.
- Be transparent.
- Comply with Apex2100 procedures.
- Not create an expectation of personal loyalty or favour.

Staff must report significant or unusual gifts received from students or families where required by School procedures.

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18. Money and Financial Relationships
Staff must not:

- Lend money to students.
- Borrow money from students.
- Enter into private financial arrangements with students.
- Purchase goods for students without legitimate reason.
- Accept inappropriate financial gifts.
- Use their position for financial benefit.

Any legitimate financial transaction involving students must follow approved Apex2100 procedures.

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19. Transporting Students
Staff transporting students must follow Apex2100's transport and safeguarding arrangements.
Where practicable:

- Authorised vehicles should be used.
- Appropriate insurance must be maintained.
- Journeys should have a legitimate purpose.
- Another adult should be present where appropriate.
- The student's destination should be known.
- The journey should be recorded where required.
- Unnecessary deviations should be avoided.

Staff should not routinely transport individual students in private vehicles unless there is a legitimate reason and appropriate authorisation.
Emergency transport should be recorded retrospectively.

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20. Residential and Boarding Boundaries
Adults working in residential environments must maintain particularly clear professional boundaries.
Staff must not:

- Enter student bedrooms unnecessarily.

- Sleep in student bedrooms.
- Allow students into private staff accommodation.
- Engage in inappropriate physical contact.
- Share beds with students.
- Engage in personal or sexual relationships with students.
- Consume alcohol or controlled substances while responsible for students.
- Allow students access to inappropriate adult activities.
- Create secret or exclusive relationships.

Where staff must enter student accommodation for safeguarding, welfare, maintenance or emergency reasons, they should follow the relevant residential procedures.

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21. Overnight Duties

Staff undertaking overnight duties must remain professional.
They must:

- Maintain appropriate availability.
- Respond to safeguarding concerns.
- Record incidents.
- Follow emergency arrangements.
- Avoid inappropriate private contact.
- Maintain appropriate professional boundaries.

Any unusual or concerning interaction with a student should be reported.

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22. Personal and Sexual Relationships

An adult working for Apex2100 must never engage in a sexual or romantic relationship with a student under the age of 18.
Staff must not:

- Make sexual comments to students.
- Flirt with students.
- Discuss their own sexual experiences.
- Make sexual jokes directed at students.
- Send sexualised messages.
- Request sexual images.
- Send sexual images.
- Encourage romantic attachment.
- Encourage secrecy concerning a relationship.

Any concern about inappropriate adult/student relationships must be reported immediately.

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23. Confidentiality and Secrets

Staff must respect student privacy but must never promise absolute confidentiality.
Students should be informed that information may need to be shared where necessary to protect them or another person.
Staff must not:

- Ask students to keep inappropriate secrets.
- Create secret communication channels.

- Conceal inappropriate contact.
- Agree to conceal abuse.
- Conceal allegations concerning another adult.
- Delete relevant safeguarding communications.

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24. Photography and Images
Staff must follow Apex2100's approved procedures concerning photographs, video and other images.
Staff must not:

- Use personal devices to photograph students unless expressly authorised.
- Store student images on personal devices.
- Share student images through personal messaging.
- Upload student images to personal social media.
- Take inappropriate photographs.
- Photograph students in changing or private areas.
- Request inappropriate images from students.

Any concern involving sexual or illegal images of children must be referred immediately through safeguarding procedures.

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25. Changing Rooms and Personal Care
Staff must respect student privacy.
Where supervision is necessary:

- Staff should follow the relevant safeguarding procedure.
- The least intrusive approach should be used.
- Staff should avoid unnecessary physical contact.
- Privacy should be maintained appropriately.
- Any unusual circumstances should be recorded.

Staff must never photograph or record students in changing, bathing or other private environments.

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26. Language and Communication
Staff must communicate respectfully.
They must not use:

- Humiliating language.
- Sexualised language.
- Discriminatory language.
- Threatening language.
- Degrading language.
- Inappropriate jokes.
- Personal insults.
- Language intended to intimidate.

Swearing directed at students is not acceptable.

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27. Behaviour Management
Staff must follow the Apex2100 Behaviour Policy.
Staff must not use:

- Humiliation.
- Threats of inappropriate punishment.
- Intimidation.
- Discriminatory sanctions.
- Excessive physical intervention.
- Collective punishment without appropriate justification.
- Sanctions designed to embarrass a student.

Behaviour management must take account of:

- Age.
- Development.
- SEND.
- Disability.
- Safeguarding needs.
- Cultural circumstances.
- Individual vulnerabilities.

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28. Students' Personal Information
Staff may have access to sensitive information about students.
Information must only be accessed and used for legitimate professional purposes.
Staff must not:

- Access records without authorisation.
- Discuss confidential information unnecessarily.
- Share information with friends or family.
- Post information online.
- Take unauthorised copies.
- Store sensitive information on personal devices.
- Disclose information to other students.

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29. Alcohol, Drugs and Substance Misuse
Staff must not be under the influence of alcohol or drugs while responsible for students.
Staff must comply with Apex2100's substance misuse requirements.
Particular care must be taken during:

- Residential trips.
- Overnight supervision.
- Travel.
- Competitions.
- Social activities.
- Educational visits.

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30. Professional Appearance
Staff should dress appropriately for their role and activities.
Clothing must not:

- Be sexually provocative.

- Contain inappropriate or discriminatory content.
- Compromise safety.
- Undermine professional standards.
- Create an inappropriate environment for students.

Specific requirements may apply to sporting, residential or specialist activities.

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31. Professional Boundaries Outside School
Professional boundaries continue outside normal School hours.
Staff must remember that:

- Students may encounter them in public.
- Students may contact them outside working hours.
- Social media may blur professional and personal boundaries.
- Residential or other arrangements may result in increased contact.

Staff should seek advice if they are uncertain whether an interaction is appropriate.

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32. Contact With Former Students
Professional boundaries should be maintained after a student leaves Apex 2100.
Particular caution is required where:

- The former student is under 18.
- The staff member continues to have professional authority.
- The relationship began while the student was at Apex 2100.
- There is a significant age or power imbalance.
- The relationship could reasonably create safeguarding concerns.

Staff should seek advice from the DSL or senior leadership where there is uncertainty.

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33. Staff Conduct During Travel and Trips
Staff accompanying students on travel or educational activities must maintain professional boundaries throughout the journey.
This includes:

- Airports.
- Stations.
- Hotels.
- Residential accommodation.
- Restaurants.
- Sporting venues.
- Excursions.
- Free time.
- Transport.

Staff must:

- Remain appropriately responsible for students.
- Follow the relevant risk assessment.
- Maintain professional boundaries.
- Report safeguarding concerns promptly.

34. Professional Boundaries With Parents and Carers

Staff should maintain appropriate professional relationships with parents and carers.
Staff must not:

- Develop inappropriate personal relationships through their professional role.
- Use their position for financial benefit.
- Share inappropriate personal information.
- Engage in inappropriate social media contact.
- Discuss confidential information about other students.

Any concerns should be raised with the appropriate manager.

35. Reporting Concerns About Colleagues

Every adult working with children has a responsibility to report concerns about another adult.
This includes:

- Suspected abuse.
- Inappropriate relationships.
- Sexualised behaviour.
- Inappropriate communication.
- Boundary breaches.
- Unexplained preferential treatment.
- Inappropriate physical contact.
- Inappropriate online activity.
- Repeated low-level concerns.
- Attempts to circumvent safeguarding procedures.
- Conduct that causes a sense of unease.

Staff must not assume that someone else will report the concern.

36. Low-Level Concerns

A low-level concern may arise where behaviour:

- Is inconsistent with this Code.
- Falls below expected professional standards.
- Creates a sense of unease.
- Appears over-familiar.
- Involves unnecessary physical contact.
- Involves inappropriate communication.
- Involves inappropriate online behaviour.
- Involves favouritism.
- Otherwise causes concern but does not meet the threshold for a formal allegation.

Staff must report low-level concerns in accordance with the **APEX 2100 Low-Level Concerns Procedure**.
A concern that appears minor must not be ignored.
Repeated low-level concerns may indicate a wider safeguarding issue.

37. Allegations of Abuse

Where a concern indicates that an adult may have:

- Harmed a child.
- Committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm.
- Otherwise met the statutory threshold for an allegation.

The matter must be reported immediately to the DSL / DDSL
Staff must not conduct their own investigation.

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38. Concerns About the DSL
Where the concern relates to Dave Breen, the concern must **not** be reported to Dave Breen.
It should instead be reported to:

- Mike Buchanan, Chair of the Apex2100 Education Board and Board Safeguarding Lead; and/or
- The appropriate external safeguarding authority.

Where necessary, the LADO, children's social care and/or police must be contacted.
Where the concern relates to the Board Safeguarding Lead, the concern must be escalated through the alternative governance or statutory route identified in Apex2100's safeguarding arrangements.

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39. Whistleblowing
Staff have a responsibility to raise concerns about unsafe practice.
Staff may raise concerns concerning:

- Safeguarding failures.
- Failure to report concerns.
- Inadequate responses.
- Inappropriate staff behaviour.
- Poor record keeping.
- Suppression of safeguarding concerns.
- Failures of leadership.
- Attempts to prevent appropriate safeguarding action.

Staff raising genuine concerns in good faith will not be subjected to retaliation.
The **APEX2100 Whistleblowing Policy** provides further information.

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40. Staff Who Are Unsure
Staff are encouraged to seek advice whenever they are uncertain about professional boundaries.
A useful test is:
"Would I be comfortable explaining this behaviour to the DSL, a parent, the Education Board or a safeguarding professional?"
If the answer is no, the behaviour should not take place.
Where uncertainty remains, staff should seek advice before acting.

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41. Recording and Transparency
Where an unusual or exceptional interaction with a student occurs, staff should consider whether it should be recorded or reported.
Examples include:

- Emergency transport.
- Emergency physical contact.
- Unexpected one-to-one contact.
- A student entering staff accommodation.

- Staff entering student accommodation.
- Unusual communication.
- A significant disclosure.
- Contact outside normal arrangements.
- Other circumstances that could reasonably be misunderstood.

Transparency protects both students and staff.

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42. Training and Induction
All staff will receive appropriate information about this Code.
New staff should receive the Code during safeguarding induction.
Training should cover:

- Professional boundaries.
- Position of trust.
- Online communication.
- Social media.
- Low-level concerns.
- Allegations against staff.
- Whistleblowing.
- Safeguarding disclosures.
- Confidentiality.
- Professional challenge.

Staff must confirm that they have read and understood the Code.

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43. Breaches of the Code
A breach may result in:

- Informal management action.
- Additional training.
- Supervision.
- A formal low-level concern.
- Disciplinary action.
- Safeguarding referral.
- Referral to the LADO.
- Referral to the police.
- Referral to the DBS.
- Referral to the Teaching Regulation Agency.
- Other action required by law or statutory guidance.

The response will depend upon the circumstances.
Not every breach will constitute a safeguarding allegation, but all concerns should be taken seriously.

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44. Protection From Malicious or Unfounded Allegations
Apex2100 recognises that allegations can have significant consequences for both children and adults.
All allegations will therefore be handled fairly, confidentially and in accordance with applicable safeguarding and employment procedures.
Apex2100 will not presume that an allegation is true or false.
Safeguarding action must nevertheless be taken where a concern is raised.

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45. Board Oversight

The Education Board will ensure that appropriate arrangements exist for:

- Implementation of this Code.
- Staff awareness.
- Safeguarding training.
- Monitoring low-level concerns.
- Monitoring allegations.
- Reviewing safeguarding themes.
- Reviewing staff conduct risks.
- Challenging safeguarding practice.

The Board Safeguarding Lead will provide appropriate strategic oversight.

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46. Monitoring and Review
The DSL will monitor compliance with this Code through:

- Safeguarding audits.
- Staff feedback.
- Training records.
- Low-level concern reviews.
- Allegation reviews.
- Safeguarding incident reviews.
- Supervision.
- Management oversight.
- Board reporting.

The Code will be reviewed at least annually.
It will also be reviewed following:

- A serious safeguarding incident.
- A significant allegation.
- Changes to statutory guidance.
- Changes to legislation.
- Safeguarding practice reviews.
- Identification of a material risk.

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47. Staff Declaration
I confirm that I have read and understood the **Apex2100 Staff Code of Conduct & Professional Boundaries Policy**.
I understand that:

- I hold a position of trust.
- I must maintain professional boundaries.
- I must report safeguarding concerns.
- I must report concerns about colleagues.
- I must report low-level concerns.
- I must follow approved communication arrangements.
- I must not develop inappropriate relationships with students.
- I must follow Apex2100 safeguarding procedures.
- Failure to comply may result in safeguarding or disciplinary action.

Name: _____
Role: _____
Signature: _____
Date: _____

APPENDIX 1 — PROFESSIONAL BOUNDARIES QUICK REFERENCE

DO

- Be professional.
- Be transparent.
- Use approved systems.
- Maintain appropriate boundaries.
- Treat students fairly.
- Report concerns.
- Record unusual incidents.
- Seek advice where uncertain.
- Challenge unsafe practice.

DO NOT

- Create secret relationships.
- Use personal messaging unnecessarily.
- Add students to personal social media.
- Give inappropriate gifts.
- Lend or borrow money.
- Have sexual or romantic relationships with students.
- Ask students to keep secrets.
- Use inappropriate physical contact.
- Photograph students inappropriately.
- Ignore concerns about colleagues.

APPENDIX 2 — PROFESSIONAL BOUNDARY TEST

Before engaging in an unusual interaction with a student, staff should consider:

1. Purpose

- Is there a legitimate professional reason?

2. Transparency

- Would I be comfortable if another colleague knew?

3. Proportionality

- Is the action necessary and proportionate?

4. Safeguarding

- Could the action place the student or me at risk?

5. Power

Apex2100

- Does my position of authority affect the student's ability to say no?

6. Recording

- Should the interaction be recorded?

7. Advice

- Should I speak to the DSL or manager first?

If there is uncertainty, pause and seek advice.

APPENDIX 3 — EXAMPLES OF POTENTIAL LOW-LEVEL CONCERNS
The following are examples only and do not automatically constitute safeguarding allegations:

- Repeatedly giving one student special attention.
- Unnecessary physical contact.
- Using overly familiar language.
- Contacting a student outside approved systems.
- Communicating with a student late at night without a clear reason.
- Taking a student somewhere alone without appropriate justification.
- Sharing excessive personal information.
- Following students on personal social media.
- Accepting inappropriate gifts.
- Making comments about a student's appearance.
- Allowing inappropriate informality to develop.
- Repeatedly breaching professional boundaries.
- Behaviour that causes a colleague to feel uneasy.

Any such concern should be considered and reported in accordance with the **APEX2100 Low-Level Concerns Procedure**.

APPENDIX 4 — KEY SAFEGUARDING CONTACTS
Designated Safeguarding Lead
Dave Breen
Designated Safeguarding Lead
Telephone: +33 6 69 19 02 82
Email: dave.breen@apex2100.org
Deputy Designated Safeguarding Leads
Karen Thomas
Deputy Designated Safeguarding Lead
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Mark Tilston
Deputy Designated Safeguarding Lead
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Board Safeguarding Lead
Mike Buchanan
Chair of Apex2100 Education Board

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