



# **CODE OF CONDUCT & ETHICS POLICY**

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# 1. Introduction to the Policy

This Code of Conduct and Ethics Policy sets out the framework, principles, and standards of behaviour that **Byram House** expects from all employees, agency workers, volunteers, and contractors. The policy applies to anyone acting on behalf of Byram House, whether at 62 Deighton Road, 66 Deighton Road, or elsewhere.

**The Home is Byram House, which comprises the two residences at 62 Deighton Road and 66 Deighton Road.** This policy applies equally across both residences.

The welfare of our service users is paramount. All those working with children, young people, and vulnerable adults must set an appropriate example, act with integrity, and uphold the highest ethical standards. This policy must be read by all colleagues and forms part of their conditions of employment.

## **The purpose of this policy is to ensure that:**

- All management action is fair and consistent, in line with the **Equality and Diversity Policy** and relevant legislation.
- The policy applies to all colleagues irrespective of age, ethnicity, gender, marital or civil partnership status, nationality, offending history, race, disability, religion or belief, sexual orientation, social status, trade union membership, or working patterns.
- Colleagues understand that this policy cannot provide a complete checklist of what is appropriate or inappropriate behaviour, but does highlight behaviour that is illegal, inappropriate, or inadvisable.
- Where no specific guidance exists, colleagues are expected to make professional judgements in the best interests of the child, acting reasonably and transparently. Such judgements must always be recorded and shared with a manager.

## 2. How this Policy Benefits the Home

This Code of Conduct and Ethics Policy benefits Byram House in the following ways:

- **Legal Compliance** – It ensures the home meets its obligations under the **Equality Act 2010**, the **Human Rights Act 1998**, the **Children Act 1989/2004**, the **Data Protection Act 2018 & UK GDPR**, the **Employment Rights Act 1996** (as amended), the **Public Interest Disclosure Act 1998**, and the **Employment Rights Act 2025**. It also reflects the ethical expectations of the **Social Care Common Inspection Framework (SCCIF) 2026** and **Working Together to Safeguard Children 2026**.
- **Child Protection** – It sets clear boundaries for physical contact, behaviour management, one-to-one situations, and transport, reducing the risk of harm or misinterpretation and supporting a safe environment for children.
- **Professional Standards** – It establishes expectations for conduct both at work and in off-duty hours where that conduct may affect the home's reputation or the safety of children.
- **Conflict of Interest Management** – It provides clear guidance on declaring personal relationships, financial interests, and recruitment bias, with a requirement for risk assessments where relationships exist with individuals connected to children in our care.
- **Confidentiality and Trust** – It reinforces the duty of confidentiality, even after employment ends, and governs the appropriate use of property, resources, and financial records.
- **Whistleblowing and Open Culture** – It commits to an open and transparent culture where colleagues can raise concerns without fear of reprisal, in line with the **Employment Rights Act 2025** (effective April 2026) and the **Public Interest Disclosure Act 1998**.
- **Inspection Readiness** – The **SCCIF 2026** expects homes to demonstrate a professional culture that prioritises children's lived experience. This policy provides a clear framework for staff behaviour and accountability.

### 3. Definitions & Legislation

#### 3.1 Definitions

Term	Definition
<b>Home</b>	Byram House, the children's home registered with Ofsted, comprising two residences at 62 Deighton Road and 66 Deighton Road.
<b>Company</b>	IMS Care LTD, the registered provider and legal entity responsible for operating Byram House.
<b>Byram House</b>	The name used throughout this policy to refer to the home and its staff.
<b>Colleague</b>	Any employee, agency worker, volunteer, contractor, or other person working on behalf of Byram House.
<b>Ethical Principles</b>	The duty to treat children, young people, and adults in our care fairly and with respect, and to act with integrity, honesty, and transparency.
<b>Conflict of Interest</b>	A situation where a colleague's personal, family, or financial interests may conflict, or appear to conflict, with their professional duties and the best interests of the home or the children in our care.
<b>Disqualification by Association</b>	A legal provision (now largely repealed for children's homes) but the home expects colleagues to disclose relevant circumstances affecting their suitability to work with children.
<b>Restrictive Physical Intervention (RPI)</b>	The use of force to control or restrain a child, which must comply with legislation, guidance, and the home's RPI policy.

<b>One-to-One Situation</b>	Any situation where a colleague is alone with a child without visual or audio oversight.
<b>Duty of Confidentiality</b>	The obligation to protect sensitive information about the home, its children, and its operations, which continues after employment ends.
<b>Professional Boundaries</b>	The clear separation between a colleague's professional role and their personal life, including avoiding exploitation of the power imbalance.

### 3.2 Key Legislation and Statutory Guidance

Legislation / Guidance	Key Provisions	Relevance to this Policy
<b>Children Act 1989</b>	Section 22 – duty to safeguard and promote the child's welfare. Section 47 – duty to investigate significant harm.	Underpins the duty of all colleagues to prioritise the child's welfare in all actions and to report concerns.
<b>Children Act 2004</b>	Establishes the statutory framework for multi-agency safeguarding arrangements.	Colleagues must cooperate with safeguarding partners and act within the local safeguarding framework.
<b>Equality Act 2010</b>	Protects individuals from discrimination, harassment, and victimisation on the basis of protected characteristics (age, disability, gender reassignment, race, religion, sex, sexual orientation, etc.).	This policy must be applied without discrimination. All colleagues must treat children and each other with fairness and respect.

<b>Human Rights Act 1998</b>	Incorporates the European Convention on Human Rights, including the right to respect for private and family life, and freedom from inhuman or degrading treatment.	Restrictive physical interventions and other actions must respect the child's human rights.
<b>Data Protection Act 2018 &amp; UK GDPR</b>	Sets out rules for processing personal data, including children's records and staff information.	Colleagues must handle all personal data confidentially and in compliance with the law.
<b>Employment Rights Act 1996 (as amended by Public Interest Disclosure Act 1998 and Employment Rights Act 2025)</b>	Provides protection for employees who make qualifying disclosures (whistleblowing). From 6 April 2026, includes sexual harassment as a protected category.	Colleagues who raise concerns in good faith are protected from detriment. Byram House will not tolerate victimisation of whistleblowers.
<b>Children's Homes (England) Regulations 2015</b>	Regulation 34 – requires homes to have policies to protect children, including a code of conduct for staff. Quality Standards.	This policy fulfils the requirement for a staff code of conduct, ensuring consistent and appropriate behaviour.
<b>Working Together to Safeguard Children 2026</b>	Published March 2026. Strengthens multi-agency accountability and anti-discriminatory practice.	Colleagues must work within the local safeguarding partnership and actively challenge discrimination.

<b>Social Care Common Inspection Framework (SCCIF) for Children’s Homes 2026</b>	Effective 1 April 2026. Focuses on children’s lived experience and how well staff understand each child.	Inspectors will evaluate whether staff conduct and professionalism contribute positively to children’s daily lives.
<b>Equality Act 2010 (Specific Duties) Regulations 2025</b>	Strengthens public sector equality duties, encouraging transparency and promoting equality.	As a service provider, Byram House will align its ethical standards with these duties.

## 4. The Policy

### 4.1 Purpose and Scope

This Code of Conduct and Ethics Policy applies to all colleagues of Byram House, including employees, agency workers, volunteers, and contractors. It sets out the minimum standards of behaviour expected when representing the home, whether at 62 Deighton Road, 66 Deighton Road, online, on home visits, or elsewhere.

The policy recognises that colleagues may need to make decisions or take action in the best interests of a child where no specific guidance exists. In such cases, colleagues are expected to:

- Act reasonably, transparently, and proportionately.
- Record the decision and actions taken.
- Share the record with their line manager as soon as possible.

Failure to follow this Code of Conduct may result in disciplinary action, up to and including dismissal.

## 4.2 Responsibilities

Role	Responsibilities
<b>All Colleagues</b>	<ul style="list-style-type: none"><li>– Care for and safeguard children/young people.</li><li>– Complete mandatory training and qualifications.</li><li>– Promote the welfare of children and provide a safe environment, protecting them from neglect, physical, sexual, and emotional abuse.</li><li>– Report any concerns about service users to the Designated Safeguarding Lead (DSL) as soon as possible (failure to do so may result in disciplinary action).</li><li>– Read, understand, and comply with the Safeguarding Policy and local procedures.</li></ul>
<b>Line Managers</b>	<ul style="list-style-type: none"><li>– Comply with all statutory guidance, minimum standards, and legislation relevant to the service.</li><li>– Ensure their team members are aware of and adhere to this Code of Conduct.</li><li>– Address any breaches appropriately.</li></ul>
<b>Directors and Registered Manager</b>	<ul style="list-style-type: none"><li>– Foster an open and transparent culture.</li><li>– Investigate any allegations of misconduct fairly and consistently.</li><li>– Ensure that risk assessments are completed where personal relationships or conflicts of interest are declared.</li></ul>

## 4.3 Standard of Practice and Accountability

### **Professional behaviour:**

- Colleagues must always treat children/young people fairly and with respect.
- Language must be appropriate, age-appropriate, and communicated in a way the child understands. **Swearing or shouting will not be permitted at any time** (except as a warning in an emergency/safety situation).
- Colleagues' actions in off-duty hours must not compromise the values or trust placed in them by the home or the public.
- Colleagues are expected to conduct themselves professionally at work, including when working from home, in virtual settings, or otherwise. Dress code, surroundings, and conduct must be appropriate for their professional role.
- Colleagues should always consider whether their actions are warranted, proportionate, safe, and applied equitably. They must work, and be seen to work, in an open and transparent way.

### **Duty to disclose changes in circumstances:**

- Colleagues must disclose any change in their circumstances or any information that may affect their suitability to work with children. This includes:
  - Being under investigation by a statutory agency (including police, social services, or safeguarding partners).
  - Being cautioned or convicted of an offence against a child, young person, or vulnerable adult.
  - Involvement in domestic violence where a child may have been affected or at risk.
- Notification must be made to the line manager immediately. Failure to disclose may result in disciplinary action.

### **Smoking, drugs, and alcohol:**

- Smoking is not permitted on any of the home's properties. Colleagues must use designated smoking areas.
- Colleagues must not attend work under the influence of drugs or alcohol under any circumstances.
- Colleagues must not bring drugs or alcohol onto any Byram House premises.

### **Personal communication and devices:**

- Colleagues are not permitted to make or receive personal calls, texts, emails, or access the internet for personal use during work time where children/young people are present.
- **Personal mobile phones must be locked away during working hours.**
- Colleagues must never use their personal equipment to take photos or make recordings of those in our care.
- Company emails, documents, and browsing history are monitored in accordance with data protection and privacy legislation. Any concerns about unauthorised, unacceptable, or inappropriate use will be investigated.

## 4.4 Safeguarding Children, Young People and Vulnerable Adults

### **General principles:**

- Colleagues should be familiar with conduct that may breach this policy. Examples of behaviour likely to constitute gross misconduct are outlined in the Disciplinary Policy & Procedure.
- Byram House is committed to creating an open and transparent culture, allowing colleagues to raise concerns even if they relate to a fellow peer.
- Colleagues are expected to act in a way that would not lead any reasonable person to suspect their actions or intent.

### **Professional boundaries and power imbalance:**

- The relationship between a colleague and a child/young person involves a power imbalance. Colleagues must ensure that this power is not used for personal advantage or gratification.
- It is not uncommon for children to develop a "crush" or infatuation with a colleague. Colleagues must make every effort to ensure their own behaviour cannot be questioned. Managers will put a plan in place to manage such situations.

### **Physical contact and comfort:**

- Colleagues should be aware that even well-intentioned physical contact may be misinterpreted. Colleagues must:
  - Never touch a child in a way that may be considered inappropriate.

- Always be prepared to explain their actions and accept that all physical contact may be scrutinised.
- Allow and encourage children to undertake self-care tasks independently, where able.
- Ensure the way they offer comfort to a distressed child is age-appropriate.
- Always tell a colleague when and how they offered comfort to a distressed child.
- Be aware of the child's individual care plans and respond accordingly.
- Consider alternatives where a child might misinterpret or be uncomfortable with physical contact.
- Report and record situations that may give rise to concern.
- Be aware of cultural or religious views about touching and be sensitive to issues of gender.

### **Behaviour management and restrictive physical intervention:**

- Colleagues must follow the home's Behaviour Management Policy.
- Use of force as a form of punishment is prohibited.
- Always try to defuse situations before they escalate (e.g., by distraction).
- Always show empathy towards the child, particularly following a physical intervention when they may be upset or hurt.
- Keep parents or carers informed of any behaviour management techniques used.
- Be mindful of factors both inside and outside the home that may affect a child's behaviour.
- Avoid shouting at children other than as a warning in an emergency/safety situation.
- Refer to national and local policy and guidance regarding Restrictive Physical Intervention (RPI).
- Comply with legislation and guidance on human rights and restriction of liberty.

### **One-to-one situations:**

- Wherever possible, ensure there is visual access and/or an open door in one-to-one situations.
- Avoid using "engaged" or equivalent signs, as these may create an opportunity for secrecy or the appearance of secrecy.
- Always report any situation where a child becomes distressed or angry.

### **Transporting children and home visits:**

- Ensure the Driving at Work Policy is followed and colleagues have an appropriate licence/permit for the vehicle.
- Plan and agree arrangements for visits with all parties in advance.
- Adhere to the agreed risk assessment and make detailed recordings of the visit.
- Colleagues must be fit to drive, free from any drugs, alcohol, or medication that may impair judgement or ability to drive.

## 4.5 Professional Relationships and Conflicts of Interest

### **Relationships with colleagues and external individuals:**

- Colleagues must notify their line manager of personal relationships with each other, or with individuals connected to children in our care (e.g., parents, family members). A risk assessment will be completed to mitigate any risks.
- Where a colleague has a relationship with a parent of a child in the home, the Registered Manager will complete a formal risk assessment and, where necessary, adjust working arrangements.

### **Recruitment and promotion:**

- A colleague must never be involved in a recruitment or promotion decision where one of the applicants is a relative, partner, or close friend.

### **Other conflicts of interest:**

- Colleagues must avoid situations where their personal, family, or financial interests may conflict with their professional duties. Examples include:
  - Having an interest (directly or through family) in a competitor, supplier, or customer of the home.
  - Acquiring an interest in property where the home has, or might have, an interest.
- Potential conflicts must be declared in writing to the Manager and Responsible Individual.

### **Gifts, entertainment, and personal favours:**

- Colleagues should not accept any gifts, entertainment, or personal favour that may influence or appear to influence their professional judgement.
- Group funds will not be used without Director consent for payments to government officials, political representatives, or for unlawful or improper purposes.

## 4.6 Use of Property and Resources

### **Confidential information:**

- Information generated within Byram House – including data, costs, prices, sales, methods of doing business – is the property of the home and must not be disclosed outside the company without prior authority from a Director, unless legally required.
- Confidentiality continues after employment ends.

### **Property and assets:**

- Resources include materials, equipment, cash, computer systems, trade secrets, and confidential information.
- Colleagues must observe guidelines for classifying and handling documents and electronic data.
- Storage of personal data is governed by the Data Protection Act 2018 and UK GDPR. Colleagues must familiarise themselves with these requirements.

## 4.7 Financial Integrity

Colleagues working in residential child care are in a position of trust and will have access to both the home's funds and children's personal funds.

- Accurate recording of all incomings and outgoings is required.

- Colleagues must not use these funds for their own personal interests. Doing so will be deemed **gross misconduct** and will result in dismissal and possible criminal proceedings.

## 4.8 Policies, Delegated Authorities and Reserved Powers

Colleagues are expected to be aware of and comply with all group policies and delegated authorities.

- Byram House gives colleagues the freedom to carry out their jobs within the spirit of our policies, trusting them to exercise professional judgement.
- This occurs within a necessary framework of corporate and legal responsibility.

## 4.9 Raising Concerns and Whistleblowing

Byram House is committed to an open and transparent culture where colleagues can raise concerns without fear of reprisal.

- Concerns about misconduct, unethical behaviour, or breaches of this policy should be raised with the line manager, Registered Manager, or the Responsible Individual.
- If a colleague feels unable to raise concerns internally, they may contact **SafeCall** (external whistleblowing partner) on 0800 915 1571 or via [www.safecall.co.uk/report](https://www.safecall.co.uk/report).
- Protection from detriment or dismissal is provided under the **Public Interest Disclosure Act 1998** and the **Employment Rights Act 1996** (as amended by the **Employment Rights Act 2025** – effective 6 April 2026, includes sexual harassment disclosures).
- Colleagues who raise a concern in good faith will be supported. Victimisation of a whistleblower will result in disciplinary action.

## 5. How the Home Trains its Staff About this Policy

Byram House provides structured training to ensure all colleagues understand and can implement this Code of Conduct and Ethics Policy effectively.

Training Element	Frequency	Method / Content
<b>Induction</b>	Upon appointment	Face-to-face training covering: the Code of Conduct and Ethics Policy, professional boundaries, safeguarding expectations, physical contact and behaviour management, one-to-one situations, transporting children, conflicts of interest, gift acceptance, confidentiality, financial integrity, whistleblowing, and the dual-site operation (62 & 66 Deighton Road).
<b>Annual refresher</b>	Every 12 months	Classroom or virtual session covering updates to legislation, case studies of ethical dilemmas, reminders on professional boundaries, and the home's open culture.
<b>Professional boundaries</b>	Annually	Specific training on recognising and maintaining appropriate boundaries with children, avoiding exploitation of the power imbalance, and managing "crush" situations.
<b>Conflict of interest and declaration</b>	At induction and as needed	Training on identifying conflicts of interest, completing declaration forms, and the risk assessment process.
<b>Whistleblowing</b>	Annually	Training on protection under the Public Interest Disclosure Act 1998 and Employment Rights Act 2025, how to raise concerns, and SafeCall.

<b>Data protection and confidentiality</b>	At induction and refresh	Training on UK GDPR, handling sensitive information, and the duty of confidentiality that continues after employment.
<b>Record keeping</b>	Ongoing	All training recorded on staff personnel files; managers monitor compliance.

**Staff are required to:**

- Read and sign this policy annually.
- Complete all mandatory training sessions.
- Declare any conflicts of interest or changes in circumstances immediately.
- Act in accordance with the Code at all times.

## 6. Related Policies and Guidance

This policy must be read in conjunction with:

- Safeguarding Policy
- Whistleblowing Policy
- Disciplinary Policy and Procedure
- Grievance Policy
- Equality and Diversity Policy
- Behaviour Management Policy
- Restrictive Physical Intervention Policy
- Driving at Work Policy
- Data Protection Policy
- Children's Homes (England) Regulations 2015
- Working Together to Safeguard Children 2026
- Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026

## 7. Policy Approval and Review Details



Byram House

<b>Policy Name</b>	Code of Conduct & Ethics Policy	
<b>Home</b>	Byram House	
<b>Reviewed by</b>	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
<b>Approved by</b>	Stacey Wagstaffe	Responsible Individual
<b>Date</b>	May 2026	