



Staff and Homestay Code of Conduct

Guardianship Organisation · AEGIS Accredited

Document reference	Policy 8.9
Version	0.6
Date	September 2026
Policy owner	Victoria Barfoot-Saunt, Compliance Director
Next review	September 2027
Applies to	All directors, staff, volunteers, homestays, students, parents and agents

Statutory basis. This policy has been written to align with Keeping Children Safe in Education 2026 (in force 1 September 2026), Working Together to Safeguard Children (current version) and the AEGIS Code of Practice and Quality Standards for Guardianship Organisations.

A note on applicability. Keeping Children Safe in Education, referred to throughout as KCSIE, is statutory guidance for schools and colleges. BOSSS UK is a guardianship organisation and is not a school, so KCSIE does not apply to it directly. BOSSS UK nevertheless adopts KCSIE as its safeguarding standard because AEGIS requires accredited guardianship organisations to align with it, and because our staff and homestays care for the same children outside term time. Where a KCSIE requirement is written for a school setting, we apply the equivalent proportionate arrangement and say so.

1 Purpose

- 1.1** Keeping Children Safe in Education requires schools to produce a code of conduct for all staff. Because guardianship organisations work with students in a similar way to schools, AEGIS requires its members to produce their own code of conduct.
- 1.2** This code sets out the professional standards and ethical considerations which BOSSS UK requires its staff, whether directly employed or self-employed, and its volunteers, contracted drivers and homestays, to adhere to.
- 1.3** In this code, "staff" includes directors, employees, self-employed contractors, volunteers, contracted drivers and homestay carers, unless stated otherwise.
- 1.4** Breach of this code may result in disciplinary action, termination of contract, removal from the homestay register, and where the harm threshold is met, referral to the Local Authority Designated Officer, the police and the Disclosure and Barring Service.

2 Principles

The principles underlying this guidance aim to encourage staff to achieve the highest possible standards of conduct and to minimise the risk of inappropriate conduct occurring. All staff are expected to:

- demonstrate the highest possible standards of personal and professional conduct and behaviour, and consistently act with honesty and integrity;
- treat each other, students, parents and the wider community with dignity and respect at all times;
- act in accordance with their duty of care to students, and ensure that the safety and welfare of students is accorded the highest priority;
- show fairness in their treatment of children, and avoid behaviours such as embarrassing or humiliating students, making jokes at the expense of students, discriminating against or favouring students, and sarcasm;
- demonstrate sensitivity for the customs, practices, culture and personal beliefs of others;
- promote an inclusive and anti-discriminatory culture, and challenge racist, faith-based, disability-based, sex-based and other discriminatory behaviour wherever it is encountered;
- have regard for the ethos and values of BOSSS UK, and not do or say anything which may bring the organisation into disrepute;
- avoid any conflict of interest between activities undertaken outside BOSSS UK and their responsibilities within it; and
- act in accordance with BOSSS UK's policies and procedures at all times.

3 Mandatory reading

This section changed on 1 September 2026. KCSIE 2026 removed Annex A, which was the shortened version of Part one for staff who do not work directly with children. There is no longer a reduced

reading route. All staff, volunteers and homestays must read Part one in full. Written confirmations are no longer collected: see 3.1.

3.1 It is mandatory for all staff, volunteers and homestays to read Keeping Children Safe in Education Part one in full. We do not collect written confirmation that it has been read. The AEGIS Quality Standards require the policies to be shared with staff and homestays and to be findable, at Standards 6.4.1, 6.9.1 and 6.10.1 and Appendix 3, rather than that reading is confirmed in writing.

3.2 The current edition and Part one are published by the Department for Education and are available here:

Document	Where to find it
Keeping Children Safe in Education, current edition, and Part one	www.gov.uk/government/publications/keeping-children-safe-in-education--2
Part one: overview for all staff	Published on the same page. This is a quick reference only and does not replace reading Part one in full

Why we link to the landing page and not to a PDF. Previous versions of this code linked directly to the 2022 edition PDF files. Those links continued to work after the guidance was superseded, so anyone following them was reading guidance that was four editions out of date. The link above always resolves to the edition currently in force.

3.3 Staff, volunteers and homestays must also read:

- the Safeguarding and Child Protection Policy 8.1, including Appendix D on the types and signs of abuse and Appendix E on additional safeguarding issues;
- this Code of Conduct; and
- the Welfare, Health and Safety Statement 6.11, in the case of homestays.

3.4 The policy pack is published at <https://www.bosssguardians.com/> and is issued to staff at induction and to homestays at recruitment. It is reissued whenever a policy is materially updated and with the annual safeguarding update. Homestays are reminded to read the current policies at every annual visit, and that reminder is recorded on the annual visit record.

4 Power and positions of trust

4.1 We promote an environment of trust, openness and clear communication between students, schools, staff and homestays, so that student welfare, safety and pastoral care is recognised as the top priority.

4.2 Staff are in a position of power and trust. They must be conscious of this and must not abuse that trust or breach any BOSSS UK policy or procedure.

- 4.3** It is a criminal offence for a person aged 18 or over in a position of trust to engage in sexual activity with a person under the age of 18. A homestay carer and a member of guardianship staff each hold a position of trust in relation to the students in their care.

5 Duty of care and professional judgement

- 5.1** Staff have a duty of care to our students. In the event of any safeguarding concern, all staff have a duty to report and resolve the matter with the DSL or Deputy DSL, in consultation where necessary with children's social care, the Multi-Agency Safeguarding Hub or another external agency as appropriate.
- 5.2** Staff must exercise their professional judgement, act with integrity and courage, and deal with any concern, or any follow-up of a disclosure or suspicion of a safeguarding issue, immediately with the DSL or Deputy DSL.
- 5.3** Staff must never investigate a safeguarding concern themselves, and must never delay reporting in order to establish the facts first.

5.4 Contact details

Role	Name	Contact number (24 hour)	Email
Designated Safeguarding Lead and Prevent Lead	Tina Wong	+44 (0)7776 206352	info@bosssguardians.com
Deputy Designated Safeguarding Lead and Deputy Prevent Lead	Eva (Haiwa) Qui	+44 (0)7922 152628	info@bosssguardians.com

If neither can be reached, contact the Managing Director, Betty Ong-Stevens, on +44 (0)7710 946398. In an emergency, dial 999.

6 Language and communication

- 6.1** Staff must always act in a polite, courteous and professional manner, and must use language appropriate to their audience, including students, other members of staff, homestays, schools and parents.
- 6.2** Staff must not use inappropriate language in front of any student or any other member of staff. Inappropriate language includes socially offensive language, whether described as bad, strong, offensive, crude, coarse, foul, blasphemous, vulgar or lewd language, or as expletives.
- 6.3** Staff must not use, repeat or tolerate misogynistic, racist, homophobic, transphobic or other discriminatory language, including where it is presented as a joke or as banter. KCSIE 2026 links misogyny to harmful sexual behaviour and requires it to be identified early. Where a student uses such language, it must be challenged and reported to the DSL.

6.4 Communicating with students

Finding a way to communicate with students is more than half the task of getting them to listen and learn. You can have a lifetime of experience and knowledge, but it will not make a difference unless you can interact effectively. Our students are also communicating in a second language, which makes the following more important, not less.

- **Face to face.** Face-to-face communication matters to people of all ages, but especially to children and teenagers. When you make eye contact you signal that you think they are important and deserving of your attention. Be aware that in some cultures sustained eye contact carries a different meaning, and follow the student's lead.
- **Youth language.** You will be familiar with youth expressions and slang. You do not have to converse in it, but allow your students to do so as long as the language is appropriate.
- **On their level.** Assume a posture of informality rather than standing over a student, which may make them feel intimidated and less likely to be forthcoming.
- **Do not interrupt.** If a student is trying to tell you something difficult or painful, give them time. If you finish their sentence or interject your opinion before it is asked for, you may never find out what was really on their mind.
- **No judging.** If a student confides in you about a personal situation, or gives an opinion, do not condemn them or their words because you disagree.
- **Language support.** Never use another student to interpret a safeguarding disclosure. Where interpretation is needed, the DSL arranges someone independent of the concern.

7 Social and sexual boundaries

7.1 Sexual contact with young people

- Staff are not permitted to have sexual relations with students, and must act in an appropriate manner in front of young people.
- The age of consent in the UK is 16. The law exists to protect children. It is not intended to prosecute under-16s who have mutually consenting sexual activity, but it will be used where there is abuse or exploitation.
- Anyone under the age of 13 can never legally give consent. Anyone engaging in sexual activity with a child aged 12 or younger is subject to the penalties set out in the Sexual Offences Act 2003.
- The law gives extra protection to young people aged 16 and 17. It is illegal to take, show or distribute indecent photographs, to pay for or arrange sexual services, and for a person in a position of trust to engage in sexual activity with anyone under the age of 18.

7.2 Social contact with students

- Social media makes it possible to connect with anyone. Teenagers rely heavily on it for communication, which can be an opportunity to engage and motivate students. However, it can also provide staff and students with direct, unsupervised contact beyond the normal level, which poses risks and could lead to misconduct.
- Staff must not socialise with students in an inappropriate manner, and must be conscious of UK law on age restrictions relating to public houses, alcohol, smoking and vaping.

- Staff must not communicate with a student through a personal social media account, a personal messaging account or a personal telephone number, except where a BOSSS UK number has been issued for that purpose or where it is necessary in an emergency. Where emergency contact is made from a personal number, it must be reported to the DSL afterwards.
- Communication with students should ordinarily take place through BOSSS UK channels, including the shared operational channels used for student, parent and homestay contact, so that it is visible and capable of being reviewed.

7.3 Social contact with parents, agents and school staff

- Social media use between staff, agents, parents and partner schools must be appropriate. Staff should exercise professional judgement and behave appropriately.
- Staff must not discuss a student, a homestay or a colleague on social media, in any forum, however anonymised they believe the reference to be.

8 Physical contact, including restraint

- 8.1** Staff must be conscious that children respond to touch in different ways. We cannot assume that a child will understand a touch that is intended as a friendly gesture. Children in our care may have backgrounds in which there has been inappropriate physical contact or abuse. These children may be confused about adult-child contact and may experience it as intrusive. This can have consequences for the child, and for any staff member where a touch meant as a caring gesture is reported as inappropriate.
- 8.2** Staff should be role models as children learn to understand the appropriateness of physical contact in different situations.
- 8.3** It is often appropriate for children to be given some physical contact and comfort, but this must always be offered with the following caution:
- ensure there are other adults around, and be prepared to be accountable to them;
 - do not show favour to individual children;
 - the area between a child's waist and mid-thigh, or near the chest, must not be touched in normal circumstances;
 - where a child tries to become physically closer than is appropriate, it is important that they do not feel rejected, but are gently guided to more appropriate behaviour by a positive suggestion;
 - hugs should be short and side by side;
 - never kiss a child, and do not encourage children to kiss adults other than their parents;
 - a school-age child should only sit on an adult's knee for a short time and for a specific reason, such as following an injury, and not too close to the body;
 - where a child requires help with changing or toileting, the dignity of the child must be respected, and great care must be taken to ensure that all physical contact is specifically and only for the purpose of the task being carried out; and
 - wherever a member of staff feels uncomfortable about the way a child or a colleague is using physical contact, even if the concern is small or uncertain, it must be discussed immediately with

the DSL or Deputy DSL as a low-level concern or, where the harm threshold is met, as an allegation.

8.4 Restraint

- 8.4.1** Physical contact can keep children safe. Staff have a duty of care to all students and must act if a student is becoming a danger to themselves or others. In rare, exceptional cases this may involve restraining a child. Physical restraint is the positive application of force with the intention of overpowering the child.
- 8.4.2** Restraint is always a last resort. The first line of approach is verbal, using a variety of techniques appropriate to the development of the child, to de-escalate, distract and instruct.
- 8.4.3** Where these approaches are unsuccessful, there may be a need to intervene physically to prevent someone putting themselves or others in danger, for example a child running into the road or a child about to hurt someone else.
- 8.4.4** Any intervention must use minimal, proportionate force: only enough to stop the incident and for the shortest possible time. The child must first be made aware of what will happen if the situation does not stop, and explanations should continue during the restraint. Examples could include blocking a student's path from stepping into a road, holding, pushing or pulling a student away from assaulting another student, leading a student by the arm away from a dangerous situation, and guiding a student away from danger with a hand in the centre of the back.
- 8.4.5** If at all possible, a second adult should be called. This serves two functions: a second adult may be able to reduce risk, and may serve as a witness.
- 8.4.6** Staff must avoid any threat or act of punitive violence. Staff are reminded that violent behaviour is a criminal act. In the unlikely event that a child is out of control and needs restraining physically, or is not obeying a lawful instruction, the police may be called.
- 8.4.7** Restraining a child must be an extremely rare, unavoidable and exceptional circumstance, and must be reported fully in writing to the DSL or Deputy DSL at the first opportunity, and certainly on the same day.
- 8.4.8** It is advisable and best practice to inform the parents of any child who has been restrained, before the child returns home.
- 8.4.9** All homestays must be aware that they may only use reasonable, appropriate and lawful means of control and contact with students, so as to provide comfort if a student is in distress and to maintain safety and good order in the home. If there is any form of physical restraint, the homestay must contact the DSL or Deputy DSL immediately to explain the circumstances.

8.5 Outright ban on corporal punishment

- 8.5.1** Corporal punishment is the causing of deliberate pain or discomfort in response to undesired behaviour by a student. It often involves striking the student, with an implement or with the open hand.
- 8.5.2** All forms of corporal punishment are banned. No member of staff, volunteer, driver, agent, school or homestay is permitted to inflict corporal punishment on a student, in any circumstances, and regardless of whether it is lawful or customary in the student's home country or in the staff member's own upbringing.

- 8.5.3** Staff and homestays must also never use the withholding of food, of contact with parents, of sleep, or of access to the DSL as a sanction.

9 Care of distressed students

- 9.1** Staff and homestays are in a position to recognise behaviour changes that characterise the emotionally troubled student. A student's behaviour, especially if it is inconsistent with your previous observations, may well constitute a cry for help.
- 9.2** Certain signals may go unnoticed for a variety of reasons, and even when noticed it can be difficult to intervene. We may feel we are out of our depth, or have competing concerns. It is important to know that the problem is unlikely to go away without an intervention.
- 9.3** Anxiety is a normal response to a perceived danger or threat to wellbeing or self-esteem. For some students the cause will be clear; for others it may be difficult to determine. Symptoms may include rapid heartbeat, chest pain or discomfort, dizziness, sweating, trembling or shaking, and cold clammy hands. The student may also report difficulty concentrating, being on edge, difficulty making decisions, sleeping problems or being too fearful to act. In rare cases a student may experience a panic attack in which physical symptoms occur spontaneously and intensely, such that the student may fear they are dying.

9.4 It is helpful to

- let them discuss their feelings and thoughts, which alone often relieves some of the pressure;
- provide reassurance;
- talk slowly and remain calm;
- be clear and directive; and
- provide a safe, quiet environment until symptoms subside.

9.5 It is not helpful to

- minimise the perceived threat to which the student is reacting;
- take responsibility for their emotional state;
- overwhelm them with information or ideas to fix their condition; or
- become anxious or overwhelmed yourself.

- 9.6** Encourage the student to seek professional help where the anxiety is interfering with their normal routine, for example where they are unable to study or sleep, or where relationships have been affected. When discussing a referral to counselling through the GP or the school, it is helpful for the student to hear, clearly and concisely, your concerns and why you think it would help.

Where distress involves self-harm or suicide risk, this section does not apply on its own. Self-harm, suicidal ideation and suicide risk are standalone safeguarding concerns under KCSIE 2026. Report to the DSL the same day and follow Part 5 of the Safeguarding and Child Protection Policy 8.1. Never suggest that a student manage distress through physical discomfort or pain, such as holding ice or snapping a band on the wrist. Techniques of that kind reinforce self-destructive behaviour.

10 Records, privacy and information

10.1 One-to-one meetings

- All meetings, and especially one-to-one meetings, must be documented in the communications log.
- The record must include the date, notes on the discussion and who was present.
- Where a one-to-one meeting is necessary, it should take place in a location where the staff member remains visible to others, and another adult should be aware that it is happening.

10.2 Students' entitlement to privacy

- 10.2.1** The European Convention on Human Rights has been implemented into domestic law by the Human Rights Act 1998. Article 8 provides that everyone has the right to respect for their private and family life, their home and their correspondence. Article 10 protects the right to freedom of expression, including the right to hold opinions and to receive and impart information.
- 10.2.2** Students have a right to expect a reasonable level of personal privacy. The right under Article 8 is not absolute and can be interfered with, but any interference must be justified and proportionate.
- 10.2.3** Staff must be conscious of a student's entitlement to privacy. However, where there is a safeguarding concern and the staff member is protecting the child, the matter must be reported to the DSL or Deputy DSL. Privacy is not a reason to withhold a safeguarding concern.

10.3 Searching students and their belongings

- 10.3.1** Staff at a school may search a pupil with consent, and schools have statutory powers to search without consent in defined circumstances. Those statutory powers belong to schools. A guardianship organisation and a homestay do not hold them.
- 10.3.2** Accordingly, staff and homestays must not search a student, a student's room, a student's bag or a student's device without the authority of the DSL, except where it is necessary to prevent immediate and serious harm. Where a search of a room takes place as part of the Missing Student procedure, it is a basic search for evidence of the reason for absence and is recorded.
- 10.3.3** Where a student is believed to be in possession of a prohibited item, such as a knife or other weapon, alcohol, illegal drugs, stolen items, tobacco or vaping products, fireworks or pornographic images, the DSL must be contacted immediately. Where there is an immediate risk of serious harm, dial 999.
- 10.3.4** Where a student voluntarily hands over an item, it must be secured and the DSL informed. Where an item is secured, a record is made of what it was, who secured it, when and what happened to it.

10.4 Confidentiality and data

- Staff must access BOSSS UK internal information only for a legitimate and authorised purpose, must not disclose internal information to unauthorised recipients, and must maintain confidentiality.

- Staff must never enter a student's personal data, safeguarding information or medical information into a public artificial intelligence tool. Information entered into such a tool may leave our control.
- Staff and homestays must handle all personal data in accordance with the Data Protection and Privacy Policy 2.10 and the Data Retention Policy.

11 Photographs, videos and images

- 11.1** Staff must ensure that photographs, videos or images of students are only taken with parental consent, and are only published where such consent has been obtained. Images must be securely stored and used only by those authorised to do so.
- 11.2** Under no circumstances should staff take images of a student without consent, or without the student knowing that images are being taken. Staff must always be able to justify the images of students in their possession, and must avoid making images in one-to-one situations.
- 11.3** Images of students must not be taken or stored on a personal device. Where this is unavoidable, the image must be transferred to the secure cloud drive and deleted from the personal device immediately, and the DSL informed.
- 11.4** Staff and homestays must not use any artificial intelligence tool to create, alter or enhance an image of a student. KCSIE 2026 expressly includes digitally altered and AI-generated images within the definition of nudes and semi-nudes, and creating such an image of a child is a criminal offence.
- 11.5** Where a member of staff or a homestay becomes aware of a nude or semi-nude image of a student, they must not view, copy, forward, save or delete it, and must not ask the student to delete it. They must report to the DSL immediately. Part 4.4 of Policy 8.1 applies.

12 Transporting students

- 12.1** Staff and drivers transporting students must hold an Enhanced DBS check with children's barred list information, and must have appropriate motor insurance covering the carriage of passengers in the course of that activity.
- 12.2** From 1 September 2026 the supervision exemption from regulated activity was removed by the Crime and Policing Act 2026. Transporting students is regulated activity where it is carried out on more than three days in any 30 day period, or overnight, and supervision is no longer a basis for treating it otherwise. See Part 9.2 of Policy 8.1.
- 12.3** Staff and drivers must drive safely and abide by the Highway Code and the Road Traffic Act 1988.
- 12.4** Where practicable, a student should not be transported alone by a single adult. Where it is unavoidable, the student should sit in the rear of the vehicle, the journey should be logged, and the homestay and the student coordinator should know the expected departure and arrival times.

13 Gifts, rewards and conflicts of interest

- 13.1** Staff must not accept gifts or hospitality that could give rise to a suspicion that they have a conflict of interest or have been influenced in a decision.
- 13.2** Staff must not give a gift to an individual student that is not given to others, and must not give a student money.
- 13.3** Staff must not enter into any private financial arrangement with a student, a parent or a homestay, including private tuition, lending or borrowing money, or accommodation arrangements outside those made by BOSSS UK.
- 13.4** Any actual or potential conflict of interest must be declared to the Managing Director.

14 Reporting concerns about a colleague

- 14.1** Where you have a concern about the behaviour of a colleague, a volunteer, a driver or a homestay, you must report it. Part 11 of Policy 8.1 sets out the whistleblowing and low-level concerns procedures, and Part 15 sets out the procedure for allegations that meet the harm threshold.
- 14.2** A low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a nagging doubt, that an adult may have acted in a way that is inconsistent with this code, including inappropriate conduct outside work. Low-level concerns must be shared with the DSL or Deputy DSL within 24 hours where they relate to a particular incident.
- 14.3** You will not be penalised for raising a concern in good faith, even if it turns out to be unfounded. Failing to raise a concern is itself a breach of this code.

Change control

Date	Version	Name	Change control comments
July 2022	0.3	Victoria Barfoot-Saunt	No substantive change at annual review
September	0.4	Victoria Barfoot-Saunt	No substantive change at annual review
12/09/2026	0.5	Victoria Barfoot-Saunt	Section 3 rewritten. The Annex A reading route is removed following KCSIE 2026, all staff, volunteers and homestays now read Part one in full, and the KCSIE hyperlinks are updated from the 2022 edition to the current landing page. Deputy DSL updated to Eva (Haiwa) Qui. Scope extended at 1.3 to volunteers and contracted drivers. Anti-discriminatory culture and misogyny added at 2 and 6.3. Social media and personal device boundaries added at 7.2 and 11.3. Self-harm and suicide risk callout added at 9.6. Search powers corrected at 10.3: a guardianship organisation does not hold the statutory search powers that belong to schools. AI provisions added at 10.4 and 11.4. Regulated activity updated at 12. Gifts and conflicts expanded at 13. New section 14 on reporting concerns about a colleague. Registered office updated
26/09/2026	0.6	Victoria Barfoot-Saunt	Section 3 amended to align with the AEGIS Quality Standards. Written confirmation that KCSIE Part one

Date	Version	Name	Change control comments
			and the BOSSS UK policies have been read is no longer collected: AEGIS requires the policies to be shared and findable, not confirmed in writing. The web address of the published pack is stated, and homestays are reminded to read the current policies at each annual visit, recorded on the annual visit record. Running header corrected to match the cover version.

End of code