



Company Code of Conduct

Company Mission Statement

This statement is specific to the Code of Conduct but accurately reflects the values and ethos of the company. Oxford Guardians (OG) is an AEGIS accredited Company and is dedicated to the provision of the highest standards of care to its client parents, students, and educational or business dealings with schools and agents. OG will always be honest and straight forward in its dealings and will strive to offer ethical, unbiased and sympathetic advice and services for the good of the client always. OG, its staff and associates will maintain these standards and values and adhere to legal and contractual responsibilities as laid out in the various company policies, the most significant of which are publicly displayed on our website at <https://www.Oxfordguardians.com>. Our clients must be able to assume that:

- Our advice is accurate, fair and unbiased.
- Our assessments represent our best independent judgement, rather than preferences.
- Safeguarding of our students is paramount and every employee or associate holds a position of trust and accepts the individual and corporate responsibility of following all legal and ethical requirement of working with children.
- Oxford Guardians will represent the parent's/ student's best interests including when students appear to be struggling with School / College syllabus or life away from home in general.
- Complaints will be recorded, investigated impartially and, if not resolved, advise the complainant to raise the matter for independent resolution with AEGIS.

Purpose Of This Code Of Conduct

This code of conduct is designed to lay out our ethical approach to the provision of our services and the values with which we operate generally as well as how we treat each other in the real and virtual workspace. OG prides itself on a workplace, both real and virtual, that is inclusive, promotes active engagement and input from all staff, recognises achievement and values loyalty both toward the company and to the staff and associates. We will protect the interests of our staff, guardians and homestay such as refusing to take Covid 19 symptomatic children from residential (Boarding) schools and inflicting them on Guardians or Homestays.

Core staff will be contracted on agreed rates of pay, including holiday, sick pay and pension contributions. Contractors will be paid the agreed rates for their services within 7 days of receiving an invoice. Parents and clients will be provided with itemised lists of expenditure from deposit accounts and refunded residual funds within 30 days of receiving the clients bank details.

Safeguarding

The underpinning principles of our safeguarding processes and policies are that the welfare of the child / young person is paramount. The term children/young person is interchangeable and applies to children who have not yet reached their 18th birthday.

OG have a robust **Safeguarding And Child Protection Policy** as well as an **Online Safety Policy** which all staff must adhere to. In accordance with our **Safer Recruiting Policy** all OG staff and associates undergo an enhanced DBS check with Child barring list checked before employment and undertake further annual training which is recorded centrally. In addition to the Children's Act 1989 and 2004 updated in September 2020 OG follow closely the relevant guidance contained in the "Keeping Children Safe in Education" 2022 DFE publication (to be updated Sept 2023). Guardians and Homestay carers must know the name and contact details of their **Local Safeguarding Partnership Local Authorities Children's Social Care** contact details, in particular the **Local Authority Designated Officers (LADO)**. Guardians and Homestay carers who have any concerns must contact the DSL, Kevin Bacon, or the DDSL, Lexi Dyer, for guidance. If abuse is suspected and is imminent or ongoing, a guardian or homestay carer must make an immediate report to the LADO and or the police.

Behaviour Management

OG recognises that very occasionally a child's behaviour will be challenging but corporal punishment and smacking are unlawful in all schools and education settings including Homestay. The law and guidance for schools' states that adults may reasonably intervene to prevent a child from:

- committing a criminal offence.
- injuring themselves or others.
- causing damage to property.

Guardians and Homestay providers should not use any form of degrading or humiliating treatment to punish a child, nor may parents give permission for the use of force. The parents of a child who refuses to adhere to OG and homestay behavioural guidelines will be asked to deal with the child immediately. A change of Homestay may solve the problem but if a child cannot be persuaded to modify his/her behaviour despite remedial efforts OG may invoke the right to sever the contract and remove the child from guardianship and to inform the school of this situation who have the potential sanction of removing sponsorship of student visa status.

Data Protection And GDPR UK

The Data Protection Act 2018, now UK - GDPR (31 December 2020), is the basis of OG 's **DPA and GDPR Policy**. We process and share data based on, inter alia, freely given consent and to deliver our contractual obligations, but it must be understood that neither the act nor our policy prevents the sharing of information for the purpose of keeping children safe. The DPA contains safeguarding of children and individuals at risk as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent or if to gain consent would place a child at risk. Sensitive and personal information is passed from OG staff to Guardians using encrypted means and from guardians to homestay by hand or by encrypted means. We are our own controllers and processors and data at rest is stored on removable HD offline and in Dropbox subject to Dropbox managed security processes. We do not have a formal Data Protection Officer (DPO) but the member of staff responsible for the

protection of data is Kevin Bacon. OG is registered with the ICO as a data controller.

Conflict-Of-Interest

Conflicts of interest occur when an employee, contractor, or job applicant's personal interests may not align with company needs or interests. If an employee uses their position for personal gain, engages in activities that will increase competitor profits, or acts in ways that could compromise the company's legal position.

Your judgment is one of your most valuable assets. You should avoid any activity or association that conflicts with or appears to compromise your objectivity or use of independent judgment in conducting business for or with the Company. Conflicts can arise in many situations. It is impossible to cover them all here, and it will not always be easy to distinguish between proper and improper activity. If in doubt please contact the MD or Director before acting.

OG recognises that Homestay providers may work for other guardianship companies especially when not looking after OG students. However, there are some specific prohibitions that may apply when hosting for OG:

- Homestay may not house more than three students at any time.
- Homestay may not house years students of 18 years or over with under 16 years students without acquiring an enhanced DBS with child barring list for the elder.
- Homestay engaged in private fostering arrangements may not house over 16 years students or family members at the same time as a PFA student without an enhanced DBS Clearance for the elder.
- Exceptionally parents may give permission for two under 16s students of the same sex to share a bedroom but different sexes must be roomed separately.

Our proprietary information is an asset and includes business objectives or strategies, employee/associate/ client lists, non-public financial information, unreleased marketing or sales material and any internal information that has not been made public. Staff and associates who deliberately pass on such information will have their contracts terminated.

If you leave OG, your obligation to protect our proprietary information continues. You should also remember that correspondence, printed matter, electronic information, documents or records of any kind, specific process knowledge, procedures - whether confidential or not - are all the property of the Company and must remain at OG. Also, you must return all Company property in your possession, custody or control if you leave the Company.

In general, personal and financial interests should be kept entirely separate from activities that may oppose the company's interests. Violation of the conflict of interest policy may result in suspension or termination of contract.

Workplace Environment

The OG workplace is a mixture of central office, remote home working and home hosting environments. Whilst remote and homeworking will only impinge directly on the company during video conferences and email exchanges, the central office standards of respect for each other, decency, honesty and unprejudiced interaction is expected of all staff and associates.

Attendance - Remote Working Hours

Attendance and adherence to agreed remote working hours is a standard measure of job performance. Punctuality and regular attendance are expected of all staff. Staff with excessive unexcused absences or repeated tardiness may be subject to a negative performance review or termination of employment.

Core staff hours are agreed at recruitment but may be altered with the agreement of senior staff to suit changing circumstance. If any variance is expected, the staff member must discuss the reason for the absence and whether holiday or time in lieu will be used.

Dress Code

Working from home means that dress codes are largely obsolete but when representing OG by attending zoom or face to face meetings with external agencies, the company expects that core staff and guardians will exercise good judgement when selecting clothing.

Internet And Social Media

Social media and communication platforms such as Whats app and Zoom are essential to our business, but staff are expected to handle their personal social media accounts appropriately. Staff should work to ensure that their personal accounts clearly state that their views do not represent our organization. Staff must not share any intellectual property on social media.

When representing the company, staff should always be respectful and avoid speaking in specifics about their work. Staff should never post discriminatory, offensive, or other illegal language on social media associated with OG. Staff must always correct or remove statements posted to their social media that are made on behalf of the company.

When attending zoom or other online meetings staff should pay particular attention to their local background to avoid inappropriate or distracting views and noise.

Gifts And Rewards

Oxford Guardians have a policy of recognising student's birthdays and will pay for a small gift to mark the occasion. Conversely pupils or parents may wish to pass guardians or homestay carers small tokens of appreciation on special occasion. However, staff and associates need to take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. It is unacceptable to receive gifts on a regular basis or of any significant value. Similarly, it is inadvisable to give such personal gifts to pupils or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

Use Of Technology For Online / Virtual Teaching.

There has been a sharp increase in the use of technology for remote learning and indeed internet usage in general since lock down of March 2020 and Guardians and Homestay must be familiar with our **online safety and acceptable use policies** and apply the guidance if necessary. Assisting children to get online for lessons and preventing inappropriate use of internet activity including gaming is key to the wellbeing and safety of students. Homestay should be aware of the time spent on the computer and website activity using parental filters if necessary. Homestay may wish to check which network a child is using. e.g. the overspill of a neighbours unprotected network.

Workplace Visitors

Visitors to the central office are rare and when invited will be hosted and always escorted whilst in the grounds.

Smoking

The Central office and the grounds of the HIF are non- smoking areas.

Our Relationship With The Government And The Law

We obey all applicable laws and it is our policy that we go beyond the simple letter to comply with spirit of the law as detailed in our various policy documents. e.g., Data Protection and safeguarding legislation. We will challenge any organisation which seeks to put us in breach of or in opposition to government guidance or legislation, e.g., Oxford Guardians campaign via members of Parliament to force residential (boarding) schools to obey government guidelines in keeping symptomatic children isolated at school.

Sarah Bacon

Sarah A Bacon Managing Director - 02 March 2021

Kevin Bacon

KT Bacon OBE DSL- 02 March 2021