

Company Code of Conduct

In all its dealings with international students and their families and UK schools, Oxford Guardians (OG) will follow the general standards laid out by The Association for the Education and Guardianship of International Students (AEGIS) in their Code of Practice, which are as follows:

- To promote and provide best and legal practice in the guardianship and hosting of all international students at schools, colleges and universities, particularly those under 18 years of age.
- To respect and support the rights, religions and customs of the international student.
- To uphold the stated ethos and values of the school attended by students in our guardianship.
- To comply with the Children Acts 1989 and 2004 and the Education Act (2002) and adhere to the guidance of the Keeping Children Safe in Education 2024 (KCSIE) updated September 2024.
- To ensure all international students have 24 hour emergency contact with a responsible adult in the UK.
- To put in place arrangements which maintain appropriate contact with the international student, the overseas parents and guardianship family and to ensure all appropriate records are up to date.
- To provide both pastoral and educational support as outlined in any literature and agreements.
- To adhere to the AEGIS grievance procedures.
- To have appropriate insurance for guardianship arrangements and to comply with UK legislation.



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.

This policy applies to core staff, local guardians, homestay hosts and third-party providers alike. We expect all of our associates to 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:

- 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.
- We will represent the parent's/ student's best interests including when students appear to be struggling with academic workload or life away from home in general.
- Our advice is accurate, fair and unbiased and based on our best independent judgement.
- 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 a 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. We pride ourselves 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 first and foremost act to represent parents and students as well as maintaining good relations with their schools and colleges.

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 client's 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 child/young person is interchangeable and applies to children who have not yet reached their 18th birthday or vulnerable adults who have.

We 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 our staff and associates undergo an enhanced DBS check with Child barring list checked and references are taken before employment and who 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" September 2024 DFE publication. 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. The first passage through parliament in Jan 2025, of the "Children's Well Being and Schools Bill" is complete and is likely to impact our safeguarding policy when it issues.

Behaviour Management

We recognise 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 significant 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 our 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 our repeated efforts we 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.

Agreements and Handbooks

The agreements and handbooks for Guardians, Homestay Hosts and Students contain the detail of safeguarding responsibilities, online safety, standards of behaviour, health and safety requirements and age appropriate rights and restrictions. The agreements are explained and signed and handbooks issued before taking on a student or entering into a homestay and parents have access to the student handbook during the enrolment process.

Data Protection, The DPA and GDPR

The Data Protection Act 2018 and the UK General Data Protection Regulation (GDPRUK) 1 Jan 2021, which places certain obligations on the Company, its staff and those who process data on our behalf, is the basis of our data protection policy. The EU GDPR was incorporated directly into UK law as the UKGDPR. We have students based in the EU and therefore parts of the EUGDPR applies to services supplied to them. The EU approved adequacy decisions on 28 June 2021 means data from the EU can flow as before in the majority of circumstances.

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 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 do 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 may result in suspension or termination of contract.

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 a member of the core staff before acting.



We recognise 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 us.

- Homestays may not host more than three students at any time.
- Homestays 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.
- Homestays engaged in private fostering arrangements may not house students over 16 years old or family members at the same time as a PFA student without an enhanced DBS Clearance.
- 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 in addition you must return all Company property.

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 outlined in this policy may result in suspension or termination of contract.

Workplace Environment

Our 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 – Core staff

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 the company by attending zoom or face to face meetings with external agencies, we expect core staff and guardians to exercise good judgement.

Communication Internet and Social Media

Staff and associates should use the company email and established WhatsApp groups to communicate with schools, students and parents. Email communication with students should be via their school email accounts to protect all concerned. Staff are to copy email correspondence with students to Info@oxfordguardians.com as a protective measure. Student reports and sensitive information should only be recorded on the company relationship manager (CRM) and database Inlocoparentis (ILP) in specific access protected folders.

Communication platforms such as WhatsApp and Zoom are essential to our business but using social media accounts for communications is not acceptable. Staff are to ensure that their personal accounts are separated from any company business and must not share any company 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 us.

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

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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 to guardians or homestay hosts small tokens of appreciation on special occasion. However, staff 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 Learning or Social Activity

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 hosts 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.

Designated Safeguarding Lead – Kevin Bacon, Director kevin@oxfordguardians.com 01604 859331 (24-hour emergency number) 07947601409

Deputy Safeguarding Lead – Lexi Dyer, Guardian Manager lexi@oxfordguardians.com 07437195385 or 07800804041 (24-hour emergency number)

Name	Position	Date	Name	Position	Date
SA Bacon	MD	2 Mar 2021	KT Bacon	DSL	2 Mar 2021
SA Bacon	MD	25 Apr 2022	KT Bacon	DSL	25 Apr 2022
SA Bacon	MD	18 Mar 2023	KT Bacon	DSL	18 Mar 2023
SA Bacon	MD	1 Apr 2024	KT Bacon	DSL	1 Apr 2024
SA Bacon	MD	10 Jan 2025	KT Bacon	DSL	10 Jan 2025