

ASSOCIATES CODE OF CONDUCT

Updated 1 December 2025

Overview

This policy aims to set and maintain standards of conduct that we expect all associates¹ to follow.

By creating this policy, we aim to ensure our environment where everyone is safe, happy and treated with respect. This Code of Conduct sets out the standards expected and the duty upon associates and volunteers to abide by it.

All associates and volunteers² have a duty to keep site users and themselves safe and to protect them from physical and emotional harm. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and clients³.

Behaviour by adults also demonstrates integrity, maturity and good judgment.

Following this Code of Conduct will help to safeguard associates, the proprietor and volunteers from being maliciously, falsely or mistakenly suspected or accused of professional misconduct in relation to clients. The Policy incorporates the DfE guidance 2009 and the latest updated guidance from the Safer Recruitment Consortium dated September 2015.

Stoke Lane Stables associates have an influential position in the establishment, and will act as role models for clients by consistently demonstrating high standards of behaviour and underpin Stoke Lane Stables's RESPECT Charter.

Stoke Lane Stables's Respect Charter

Right to feel safe

Empathy for other's feelings

Share thoughts and ideas without judgement

Pride in yourself, others and the environment

Everyone Included

Consideration for everyone's individual needs

Take time to appreciate others

We expect that all associates will act in accordance with personal and professional

behaviours; personal and professional integrity, respecting the safety and wellbeing of others.

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our associates disciplinary and dismissal policy.

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, associates will use their professional judgement and act in the best interests of Stoke Lane Stables and its clients.

Legislation and Guidance

We are required to set out a associates code of conduct in line with the statutory safeguarding guidance 'Keeping Children Safe in Education'.

General Obligations

Associates set an example to clients. They will:

- Maintain high standards in their attendance and punctuality
- Never use inappropriate or offensive language
- Treat clients and others with dignity and respect
- Show tolerance and respect for the rights of others
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- Express personal beliefs in a way that will not overly influence clients, and will not exploit clients' vulnerability or might lead them to break the law
- Not put the name of Stoke Lane Stables or another member of associates in disrepute or share personal belief/opinions during a conversation with another member of associates or client(s).

Safeguarding

Associates have a duty to safeguard clients from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, or neglect.

Associates will familiarise themselves with our safeguarding policy and procedures, the Prevent initiative, recognising signs of child exploitation, and ensure they are aware of the processes to follow if they have concerns about a child. All associates must undertake relevant,

up to date training to ensure effective execution of their roles and expectations.

Associate/Client Relationships

Associates will observe proper boundaries with clients that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If associates and clients must spend time on a one-to-one basis, associates will ensure that:

- This takes place in a public place that others can access
- Others can see in to the room
- A colleague⁴ knows this is taking place

Further information can be found in the Lone Worker Policy and associates must refer to a clients' personnel information where there may be additional risk and requirements for additional associates to be present. Associates should avoid contact with clients outside of hours.

Personal contact details should not be exchanged between associates and clients. This includes social media profiles. Clients only have access to the Whatsapp group.

If an associate is concerned at any point that an interaction between themselves and a client may be misinterpreted, this should be reported to the Proprietor immediately.

Communication and Social Media

Associates' social media profiles should not be available to clients.

Associates should not attempt to contact clients or their parents via social media, or any other means in order to develop any sort of relationship.

Associates must not make any efforts to find clients or parents' social media profiles and must not accept any 'friend requests' on social media. Any requests must be reported to the Proprietor immediately.

Associates should also not respond to any message via social media from a student or parent.

Associates will ensure that they do not post any images online that identify children who are clients at the school.

Physical Contact

There are occasions when it is entirely appropriate and proper for associates to have physical contact with clients, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the client's individual needs.

Not all clients feel comfortable about certain types of physical contact; this should be recognised and relevant notes must be made within clients documentation. Associates should acknowledge that some clients are more comfortable with touch than others and/or may be more comfortable with touch from some adults than others.

Associates should respond and take note of the clients reaction or feelings and, so far as is possible, use a level of contact and/or form of communication, which is acceptable to the client.

Associates should also:

- Be aware that even well intentioned physical contact may be misconstrued by the client, an observer or any person to whom this action is described.
- Never touch a client in a way which may be considered indecent.
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny.
- Never indulge in horseplay or fun fights.
- Always allow/encourage clients, where able, to undertake self-care tasks independently.
- Ensure the way they offer comfort to a distressed clients is age appropriate and chest to chest contact is not made.
- Always tell a colleague when and how they offered comfort to a distressed student.
- Establish the preferences of clients.
- Consider alternatives, where it is anticipated that a student might misinterpret or be uncomfortable with physical contact.
- Always explain to the student the reason why contact is necessary and what form that contact will take.
- Take extra caution where it is known that a learner has suffered previous abuse or neglect. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one client, in one set of circumstances, may be inappropriate in another, or with a different learner.

It is good practice if all parties clearly understand at the outset, what physical contact is necessary and appropriate in undertaking specific activities. Keeping parents/carers and clients informed of the extent and nature of any physical contact may also prevent allegations of misconduct or abuse arising.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of associates believes that an action by them or a colleague could be misinterpreted, or if an action is observed which is possibly abusive the incident and circumstances should be immediately reported to the establishment manager. Where appropriate, the establishment manager should consult with the Local Authority Designated Officer (LADO).

Behaviour Management

Corporal punishment and smacking is unlawful in all settings.

Where clients display difficult or challenging behaviour, adults should follow the establishment's behaviour policy and its sanction procedure using strategies appropriate to the circumstance and situation.

Associates should take extreme care to avoid any practice that could be viewed as unlawful, a breach of the client's human rights and/or false imprisonment.

This means that associates should:

- Not use force as a form of punishment.
- Try to defuse situations before they escalate e.g. by distraction.
- Keep parents informed of any sanctions or behaviour management techniques used.
- Be mindful of and sensitive to factors both inside and outside of the school or setting which may impact on a clients behaviour.
- Follow the behaviour policy.
- Behave as a pro-social model.
- Avoid shouting at clients other than as a warning in an emergency/safety situation.
- Refer to national and local policy and guidance regarding Restrictive Physical Intervention

The Use of Control and Physical Intervention

A person will not be taken to have used corporal punishment if the action was taken for reasons

that include averting an immediate danger of personal injury to, or an immediate danger of death of, any person including the child.

The law and guidance states that adults may *reasonably* intervene to prevent a child from:

- Committing a criminal offence.
- Injuring themselves or others.
- Causing damage to property.

Great care must be exercised in order that adults do not physically intervene in a manner, which could be considered unlawful.

In all cases where physical intervention has taken place, the incident and subsequent actions should be recorded and reported. The Proprietor should include the clients parents during the debriefing.

Similarly, where it can be anticipated that physical intervention is likely to be required, risk assessments must be put in place for this prior to attendance.

Sexual Conduct

Any sexual behaviour by a member of associates with or towards a client is unacceptable. It is an offence for a member of associates in a position of trust to engage in sexual activity with a student under 18 years of age and sexual activity with somebody under this age could be a matter for criminal and/or disciplinary procedures.

Clients are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions depending on their age and understanding. This includes the prohibition of sexual activity with any persons under the age of 18 by adults, including those adults who are in a position of trust.

This means that associates should:

- Not have any form of sexual contact with a client from the Centre or related educational settings.
- Avoid any form of touch or comment, which is, or may be considered to be, indecent.
- Avoid any form of communication with a client, which could be interpreted as sexually suggestive, provocative or give rise to speculation e.g. verbal comments, letters, notes, by email or on social media, phone calls, texts, physical contact.
- Not make sexual remarks to or about a client.

- Not discuss sexual matters with or in the presence of clients, this includes any inappropriate discussion of personal relationships outside of the environment.

Transporting Clients

All work with clients and parents will be undertaken in the establishment, negating the need for any associates or volunteers to be required or offer to transport clients as part of their work. However, a lift in the horsebox etc is commonplace.

Associates should not offer lifts to clients unless the need for this has been agreed by the parent in writing. A designated member of associates should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.

If the need arises associates should:

- Always make detailed records including times of arrival and departure.
- Wherever possible and practicable it is advisable that transport is undertaken with at least one adult additional to the driver acting as an escort.
- It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so.
- Associates should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements.
- They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.

First Aid and Medication

Stoke Lane Stables have an adequate number of qualified first-aiders. Parents should be informed when first aid has been administered through the EC Pro app or direct verbal contact.

In circumstances where a client needs medication regularly, this would usually be recorded in their individual healthcare plan. This provides details of the level and type of support a learner needs to manage effectively their medical condition in school and should include information about the medicine to be administered, the correct dosage and any storage requirements.

Medication of any kind must only be administered with the consent of the parent/carer. Any medication administered must be that of the student and be clearly prescribed with their name labelled on the medication. Where medication is provided a witness must be present to counter sign the administration of the medication.

Associates should only be provided with medication that he been brought in from home with a named label. Clients with medical needs are clearly identified with a red first aid cross next to their name on the EC Pro app.

Photography, Videos and Other Images

Many educational activities involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity.

Under no circumstances should associates be expected to use their personal equipment to take images of clients at or on behalf of the setting. If they do, images/videos taken should be immediately deleted.

Whilst images are regularly used for very positive purposes adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes.

Particular regard needs to be given when images are taken of young or vulnerable clients and whether permission has been given. Associates must not assume that permission has been granted by all parents/carers and the student.

Clients who have been previously abused in a manner that involved images may feel particularly threatened by the use of photography, filming etc. Associates should remain sensitive to any client who appears uncomfortable and should recognise the potential for misinterpretation.

Acceptable Use of Technology

Associates will not use technology in the establishment to view material that is illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, using social media, gambling and viewing pornography or other inappropriate content.

Sharing Concerns and Recording Incidents

All associates should be aware of the Centre's safeguarding procedures, including the procedures for dealing with allegations against associates and volunteers. Members of associates should feel able to discuss with the Proprietor any difficulties or problems that may affect their relationship with or behaviour towards clients, so that appropriate support can be provided and/or action can be taken.

In the event of an allegation being made, by any person, or incident being witnessed, the relevant information should be immediately reported to the Proprietor or Designated Safeguarding Lead as appropriate **and** recorded.

In order to safeguard and protect clients and colleagues, where associates have any concerns about someone who works with children they should immediately report this to the Proprietor or HWO.

Confidentiality

In the course of their role, members of associates are often privy to sensitive and confidential information about the establishment, associates, clients and their parents.

This information will never be:

- Disclosed to anyone without the relevant authority
- Used to humiliate, embarrass or blackmail others
- Used for a purpose other than what it was collected and intended for

This does not overrule associates' duty to report safeguarding or child protection concerns to the appropriate channel where associates believe a child is at risk of harm.

Honesty and Integrity

Associates should maintain high standards of honesty and integrity in their role. This includes when dealing with clients, handling money, claiming expenses and using the establishments property and facilities.

Gifts must be declared and recorded to your Proprietor.

Associates will ensure that all information given to the riding school about their qualifications and professional experience is correct.

Associates must maintain professional integrity within all areas of their role and should not, in anyway put the name of Stoke Lane Stables or another member of associates in disrepute or share personal belief's/opinions during a conversation with another member of associates or clients.

Dress Code

Associates will dress in a professional, appropriate manner. Outfits will not be overly revealing. Clothes will not display any offensive or political slogans. Instructor Gilets will be given to associates for wearing during teaching hours.

Conduct Outside of Work

Associates will not act in a way that would bring Stoke Lane Stables into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about Stoke Lane Stables, its partners or stakeholders on social media.

Links with Other Policies

This policy links with our policies and documentation on:

- Associates Grievance Policy, which will be used if associates breach this code of conduct
- Lone Worker Policy
- Safeguarding Policy
- Data Protection Policy

¹ **Associate** - A self-employed individual engaged by Stoke Lane Stables to provide professional services, including instructors. Associates are not employees, and this term does not create an employment relationship.

² **Volunteer** - Any individual who freely offers their time and services to Stoke Lane Stables without receiving payment or remuneration. Volunteers carry out activities in support of the operations or events of Stoke Lane Stables and are not employees or associates.

³ **Client** - Any person who engages the services of Stoke Lane Stables, including riders, parents, or guardians who book lessons, sessions, or other services.

⁴ **Colleague** - Any person carrying out duties on behalf of Stoke Lane Stables, including self-employed associates and registered volunteers. Use of the term *colleague* is for convenience and does not imply employment.