



TGM Code of conduct for safeguarding children

A Code of Conduct has a number of important functions.

It:

- sets out what behavior is acceptable and unacceptable
- defines standards of practice expected from those to whom it applies
- forms the basis for challenging and improving practice
- helps to safeguard staff/volunteers by encouraging them to adhere to agreed standards of practice
- sets out for children and parents/carers the standards of practice which they and the organisation should expect from those who work/volunteer with children.
- Promote responsible digital behavior.

TGM Holidays supports and requires all members of staff to observe the following standards of practice, including verbal and non-verbal actions when involved in activities with children.

All concerns about breach of this Code of Conduct will be taken seriously and may result in disciplinary procedure.

Good Practice

- Make sport and activities fun, enjoyable and promote fair play
- Treat all participants equally, with respect, dignity and fairness
- Involve supervising staff wherever possible
- Build balanced relationships based on mutual trust
- Include children in the decision-making process wherever possible
- Always work in an open environment. Wherever possible avoid private or unobserved situations
- Put the welfare of each child first before winning or achieving performance goals
- Be an excellent role model including not smoking or drinking alcohol in the company of children
- Give enthusiastic and constructive feedback rather than negative criticism
- Recognise the developmental needs and capacity of children
- Avoid excessive training and competition, pushing children against their will and putting undue pressure on them



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Practice to be avoided

In the context of your role as an activity instructor the following should be avoided:

- Having 'favourites' - this could lead to resentment and jealousy by other children and could be misinterpreted by others
- Spending excessive amounts of time alone with children away from others
- Entering children's bedrooms on trips away from home, unless in an emergency situation or in the interest of health and safety. If it is necessary to enter rooms, knock and say that you are coming in. The door should remain open, if appropriate
- Avoid, where possible, doing things of a personal nature for children that they can do for themselves
- "Friend" or follow service users from personal accounts. Share confidential information. Post images without consent. Comment on safeguarding matters online.

Unacceptable Practice

In the context of your role as an activity instructor, the following practices are unacceptable:

- Engaging in sexually provocative games, including horseplay
- Engaging in rough or physical contact unless it is permitted within the rules of the game or competition
- Forming intimate emotional, physical or sexual relationships with children
- Allowing or engaging in touching a child in a sexually suggestive manner
- Allowing children to swear or use sexualised language unchallenged
- Making sexually suggestive comments to a child, even in fun
- Reducing a child to tears as a form of control
- Allowing allegations made by a child to go unchallenged, unrecorded or not acted upon
- Inviting or allowing children to stay with you at your home or accommodation
- A Coach and/or other leader sharing a room alone with a child

Note: It is particularly important not to develop social relationships with children outside the working environment. Staff should not exchange telephone numbers or any social media contacts or pages with children. Any contact between an activity instructor and children should be supervised by an appropriate adult and social media interactions should be through 'official' and public means.



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Practice relating to ICT

In the context of your role as an activity instructor,

Use technology appropriately and responsibly.
Ensure compliance with this policy.
Address breaches promptly.
Monitor safe use of ICT systems.
Support safeguarding investigations.

Managing Risks Posed by ICT Devices

The organisation will assess risks associated with:

Internet-enabled devices.
Personal and organisational mobile phones.
Portable storage devices.
Wi-Fi access.
Remote working arrangements.
Video conferencing platforms.
Cloud storage applications.

Assessments will consider:

Access to inappropriate content.
Cyberbullying.
Grooming risks.
Exposure to harmful material.
Data protection breaches.
Unauthorised contact with service users.

Device Security

The organisation will ensure:

Devices are password protected.
Multi-factor authentication is used where available.
Security software is installed and updated.
Devices are encrypted where possible.
Access rights are restricted according to role.
Software updates are applied regularly.



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Personal Devices

Use of personal devices must be carefully controlled.

Staff and volunteers must not:

- Store safeguarding information on personal devices.
- Use personal devices to photograph children or vulnerable adults, exceptions must be approved by management and documented.
- Communicate with service users through personal social media accounts.
- Share confidential information via personal messaging applications.
- Access inappropriate or illegal content.
- Use organisational equipment for harassment or abuse.
- Circumvent security controls.
- Download unauthorised software.
- Share passwords.

Online Safety and Online Activity

Staff and volunteers must:

- Model appropriate online behaviour.
- Promote safe internet usage.
- Report concerning online activity.
- Use approved organisational platforms.

Online Communication

Communication with children and vulnerable adults must:

- Be appropriate, transparent, and professional.
- Occur via approved organisational systems.
- Be recorded where practical.
- Involve parents/carers where appropriate.

Staff must not:

- Communicate through personal social media accounts.
- Engage in private or secret online communications.
- Exchange personal information.



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Social Media

The organisation recognises the benefits of social media but also the safeguarding risks.

Staff and volunteers must not:

"Friend" or follow service users from personal accounts.

Share confidential information.

Post images without consent.

Comment on safeguarding matters online.

Managing Risks Associated with Digital Imaging

Digital images and videos can present safeguarding, privacy, and reputational risks.

All photography and filming must be:

Necessary and appropriate.

Conducted with consent where required.

Used for legitimate organisational purposes.

Stored securely.

Consent

Prior consent must be obtained before:

Taking photographs.

Recording video.

Publishing images.

Using images for promotional purposes.

Consent records must be maintained.

Taking Images

Staff and volunteers must:

Use organisational equipment where possible.

Ensure images are appropriate and dignified.

Avoid unnecessary close-up images.

Consider privacy and safeguarding implications.

Staff must not:

Take images in changing areas, toilets, or private spaces.

Use personal devices unless specifically authorised.



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Share images via personal social media or messaging applications.

Storage and Retention

Images and recordings must:

- Be securely stored.
- Be accessible only to authorised individuals.
- Be deleted when no longer required.
- Comply with data protection requirements.

Publication

Before publication:

- Appropriate consent must be confirmed.
- The welfare of individuals must be considered.
- Personal information must not be disclosed unnecessarily.
- Locations and identifying information should be limited where appropriate.

Monitoring

The policy will be reviewed every three years, or in the following circumstances;-

- Changes in legislation and/or government guidance
- Changes to best practice guidance from the outdoor activities industry lead governing bodies.
- As a result of any other significant change or event.

(Last reviewed July 2026)
V4



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