Staff Code of Conduct

Staff must read and understand the following documents and policies which give clear expectations relating to staff conduct:

Staff Employment Handbook	Positive Behaviour Policy	Anti-Bullying Policy
Safeguarding Policy	Whistleblowing Policy	Social Media Policy
Physical Restraint Policy	Health and Safety Policy	
Curriculum, Teaching and Learning Policy	Medical Needs and First Aid Policy	
Acceptable Use of ICT – Staff Conduct	Care and Supervision Policy	
Preventing Sexual Harassment Policy	Staff Wellbeing Policy	

Monitoring

The school's Pastoral Care, Behaviour, Safeguarding and HR Committee is responsible for monitoring the impact of this policy.

Date of update	(U) Updated (R) Reviewed by	How was updated disseminated	Parents informed	Policy on website	Gov review
2/2/17	H. Gee (U)	Teacher drive – staff briefing	No	Yes	
April 2019	H. Gee (U)	Teacher drive – staff briefing	No	No	
Nov 2019	H. Gee	Email to staff	No	No	
Jan 2022	H. Gee	On TEAMs – staff briefing	No	Yes	Feb 2022
Sept 2022	H.Gee (R)	On TEAMs – staff briefing	No	Yes	
Nov 2023	H. Gee	On TEAMs – staff briefing	No		
Jan 2024	K. Pheasant	E-mail to all staff	No		
Jan 2025	K Pheasant	On TEAMS	No	No	Feb 2025

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Introduction

Bowdon Prep School expects the highest standard of conduct from all its employees and professional which work at the school.

Positive
Proactive
Professional

The school's reputation and integrity are of paramount importance and we cannot accept behaviour that may bring the school into disrepute. All employees are expected to behave courteously, honestly and with integrity in the course of their work and in their dealings with pupils, parents, colleagues and other individuals with whom they come into contact in the course of their work. Conduct outside the workplace and whilst 'off-duty' may also impact on the school, and employees should take care to ensure the appropriate image is projected at all times.

This code is not exhaustive but is written to assist staff and it is important that staff should take advice and guidance if necessary. The underlying purpose is to ensure that BPS provides a high-quality service to its pupils and stakeholders in accordance with our aims and vision and to promote public confidence in the integrity of the school. It takes in the requirements of the law and attempts to define the required levels of professionalism to ensure the well-being of the school, its staff and its customers. It has been drafted to comply with school policies and procedures.

- Staff are requested to read this code carefully and consider the issues which it raises.
- The Headteacher should also ensure that all staff are aware of the code's contents and are fully briefed on its implications.
- Reference to this code will be made in all contracts of employment, and copies will be given to all staff. In addition, the induction programme for all new staff will reinforce the principles of this code.
- Investigations of alleged breaches of this code will be covered under the school's disciplinary procedures and related codes of practice

The Code of Conduct follows the advice given in the current (September 2024) version of KCSiE.

Objectives of a safe school culture

The purpose of this code of conduct is:

- To safeguard pupils and protect staff
- To make explicit expectations of performance and conduct
- For all staff to have confidence to report concerns with full confidentiality
- To respond promptly to concerns - we always investigate and address issues
- To exercise appropriate sanctions
- To create and maintain an ethos of mutual respect, openness and fairness

It applies to all staff working at Bowdon Prep School, whether paid or unpaid, and in whatever position. There are no exceptions to this. The standards also apply to any school functions, social or otherwise.

Physical and Mental Wellbeing

All staff should take care of their physical and mental health. This includes maintaining a healthy work-life balance. We take issues of stress very seriously and look to provide appropriate support and help in these cases.

All staff have access to counselling. We encourage anyone needing support to discuss issues and concerns with their Phase Leader, a Mental Health First Aider or the Headteacher, in confidence. Support can be provided both internally (eg through the provision of a mentor), or externally through the Employee Assistance Programme or Occupational Health Service. Trades Unions also provide help, support and advice for their members, and membership of a trade union is strongly encouraged.

Personal and Professional Conduct

All staff are expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a career. Staff should uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by:

- treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
- having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others
- not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs (DfE: The Prevent Duty 2015)
- ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.
- having proper and professional regard for the ethos, policies and practices of the school in which they teach, and maintain high standards in their own attendance and punctuality.
- demonstrating an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

'Statutory frameworks' includes all legal requirements, including but not limited to the requirement to promote equal opportunities and to provide reasonable adjustments for those with disabilities, as provided for in the Equality Act 2010.

Dress and Appearance

We recognise that dress and appearance are matters of personal choice and self-expression. However, all staff must dress in a manner that is appropriate to a professional role and that promotes a professional image.

- Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.
- Staff should dress safely and appropriately for the tasks they undertake.
- Where possible tattoos and body art should be covered while staff are in school. Discreet tattoos and piercings are acceptable.

Smoking, Alcohol, e-cigarettes and other substances

BPS is a non-smoking site. Staff must not smoke or use e-cigarettes on school premises or outside school gates. Any member of staff wishing to smoke or use an e-cigarette must leave the school grounds.

- Staff must not smoke or use an e-cigarette whilst working with or supervising pupils offsite.
- Staff must not consume illicit drugs or other illegal substances on or near school premises.
- Alcohol should not be consumed at school events when staff have responsibility for pupils.

Gifts / Hospitality

Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others or lead the giver to expect preferential treatment. However, there may be occasions where pupils or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.

- It is unacceptable to receive gifts on a regular basis or to suggest to pupils that gifts are appropriate or desired. Cash must not be accepted as a gift. If you are unsure whether to accept a gift you should consult the Bursar.
- Personal gifts must not be given by staff to pupils.
- Business and Related Interests: To avoid any misunderstandings that might arise, all staff are required to declare any financial or related interests they have in companies or individuals from whom BPS may purchase goods or services. The disclosure should also include business interests of relatives, such as a parent or spouse where influence could be exerted over a member of staff by that person. All such declarations should be reported annually to the Bursar.

Working with Others

Staff

All staff are expected to treat each other with respect. Relationships between staff should be characterised by fairness, openness and respect. This means valuing all contributions, acknowledging differences, and working together to build a climate of continuous improvement. Politeness and respect are essential ingredients: Where differences occur, they should be dealt with calmly and fairly.

School employees are expected to give the highest possible standard of service to the public and to support fellow employees with impartiality. The highest standard of probity must apply and employees must report any suspected unlawfulness, mal-administration, impropriety or breach of procedure of which they are aware to their Phase Leader or Headteacher. The School, for its part, considers it has a duty to protect employees against unjustified allegations of wrongdoing. (See Safeguarding Policy - Managing Allegations against Staff)

Parents

Staff should aim to create a welcoming and open relationship with parents. All parental concerns should be treated seriously and dealt with promptly.

Confidentiality

- Members of staff may have access to confidential information about pupils, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil on a need-to know basis.
- Staff should never use confidential or personal information about a pupil or their family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the pupil.
- Staff may at some point witness actions which need to be confidential. For example, where a pupil is bullied by another pupil, this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the pupil, parent or carer.
- Staff have a statutory obligation to share with the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads any information which gives rise to concern about the welfare or safety of a pupil or that might suggest a pupil is in need or at risk of significant harm. Staff should pass on information without delay in accordance with the Child Protection and Safeguarding Policy and procedures and this should be recorded.
- Staff should refer to the Child Protection and Safeguarding Policy regarding information sharing. If you are in any doubt about whether to share, you should seek guidance from a member of the Senior Leadership Team.
- Any media or legal enquiries should be passed to the Senior Leadership Team and only approved staff and Governors should communicate to the media about the school.

The role of all BPS staff in Child Protection

Staff need to take a proactive approach towards both safeguarding and behaviour policies, through the creation of a positive classroom environment where all children are respected, and through PSHE and circle time in particular. This includes not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The expression of extremist views by staff will not be tolerated and should be reported to the Headteacher, who will contact relevant authorities if necessary.

To meet and maintain our safeguarding responsibilities towards our pupils, all members of staff and those who come into contact with our pupils are expected to adhere to the following good practice, which includes:

- treating all pupils with respect.
- setting a good example by conducting themselves appropriately.
- involving pupils in decisions that affect them.

- encouraging positive and safe behaviour among pupils.
- being a good listener.
- making themselves familiar with the school's Child Protection (Safeguarding) Policy and procedures and other documents relating to wider safeguarding issues, for example bullying, and confidentiality.
- taking reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.
- complying with school policies and procedures that support the well-being and development of pupils.
- knowing the school's DSL and deputy DSLs and have an understanding of their role.
- reporting any concerns immediately to either the DSL or the deputy DSLs.
- consulting with the designated persons if in any doubt as to how to proceed.
- raising concerns about poor or unsafe practices with the DSL or deputy DSL and that such concerns are addressed sensitively and effectively.
- understanding that they may make a referral to external agencies themselves if they deem it necessary and the DSL disagrees.
- having the skills, knowledge and understanding to keep safe children who are looked after by the local authority.
- read, sign to say they have understood and agree to the school's child protection policy, alongside Part 1 and 5 and Annex B of Keeping Children Safe in Education (KCSIE 2024).
- being alert to changes in pupils' behaviour and recognise that challenging behaviour may be an indicator of abuse.
- Reporting low-level concerns– a teacher having favourites for example, or a member of staff using inappropriate sexualised language
- asking the pupil's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid.
- maintaining appropriate standards of conversation and interaction with and between pupils and their parents and avoiding the use of sexualised or derogatory language.
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- understanding that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Such behaviours could include but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their personal mobile phones
- Using inappropriate sexualised, intimidating, or offensive language

Concerns About and Allegations Against Members of Staff - See Safeguarding Policy

The safety and wellbeing of our pupils depends on the vigilance of all our staff and their prompt communication to the DSL or Headteacher of any concerns, no matter how small, about any adult's suitability to work with or have access to children. The notification and prompt handling of all concerns about adults (including staff, supply staff and volunteers) is fundamental to safeguarding children. It helps to identify and prevent abuse, and to protect adults against misunderstandings or misinterpretations.

Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns, or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated. When handling allegations, the school will always follow Part 4 of KCSIE. Responsibility for appropriate action rests with the Headteacher. The procedure would be used in all cases in which it is alleged that a teacher or other member of staff or volunteer has:

a. behaved in a way that has harmed a child, or may have harmed a child
b. possibly committed a criminal offence against or related to a child
c. behaved towards a child or children in a way that indicates they would pose a risk of harm to children or

d. behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferrable risk).

The LADO will be informed promptly, and the LADO will determine the distinction between a complaint, a concern about the quality of practice and an allegation.

Informing others about concerns

Any such concerns or allegations about an adult in the school (including supply staff and volunteers, as well as those working with the pupils outside of the school) should be reported to the Headteacher immediately. Staff or pupils may discuss their concern with the DSL and the DSL will then refer it to the Headteacher immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed. If the allegation is about the DSL, then the Headteacher will need to be informed directly, without informing the DSL.

If the allegation is about the Headteacher, staff must immediately inform the Chair of the Governing Body (or, in her absence, the Governor with Responsibility for Safeguarding) without informing the Headteacher. The Headteacher (or the Chair of the Governing Body in cases of allegations against the Headteacher) will inform the LADO of all allegations if she believes that a member of staff has behaved in a way which meets the criteria above as soon as possible and in any event within 24 hours of the school becoming aware of the allegation. If it is suspected that a crime has been committed, the Police will be informed, and then the LADO. The role of the LADO is to provide advice and preside over the investigation or any allegations or suspicion of abuse directed against anyone working in the school.

The Headteacher will normally discuss all allegations with the DSL unless it relates to the DSL. Borderline cases will be discussed without identifying individuals in the first instance. The school would not begin an investigation into any allegations without first speaking to the LADO.

Levels of thresholds

KCSIE (2024*)* has two sections covering two levels of allegation/concern and should be referred to as the source document:

- allegations that may meet the harms threshold;
- allegations/concerns that do not meet the harms threshold ('low level concerns' – Appendix 2).

Allegations that may meet the harms threshold

These are allegations that might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in our school. If it has been alleged that any member of staff including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children: and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including because of transferable risk)

If we identify:

- that a child has been harmed,
- that there may be an immediate risk of harm to a child, or
- if the situation is an emergency,

then we contact children's social care and as appropriate the police immediately in accordance with the processes set out in part one of *KCSIE*.

If an allegation is made, it is essential to looking after the welfare of the child and also investigate and support the person subject to the allegation. We will conduct basic enquiries to establish facts that will help them determine whether there is any foundation to the allegation.

Further, detailed guidance can be found in KCSIE (2024) on:

- when to inform the individual of the allegation;
- what to do if there is cause to suspect a child is suffering or is likely to suffer significant harm;
- where the case manager is concerned about the welfare of other children in the community of the member of staff's family;
- where it is clear or decided that an investigation by the police or children's social care is unnecessary;
- where the initial discussion leads to no further action;
- where further enquiries are necessary (including where there is a lack of appropriate resource within the school);
- suspension (which should not be an automatic response when an allegation is reported);
- support (of the child(ren) involved, employees of the school subject to an allegation and the parents or carers of any child involved);
- confidentiality and information-sharing;
- allegation outcomes;
- following a criminal investigation or prosecution;
- unsubstantiated, unfounded, false or malicious accusations;
- returning to work;
- resignations and settlement agreements;
- record keeping;
- references;
- learning lessons;
- non-recent allegations.

As soon as basic enquiries and initial information have been conducted to establish facts and help determine whether there is any foundation to the allegation, the LADO will be promptly contacted. There will then be a discussion with the LADO(s) about the allegation which will consider the nature, content and context and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Schools should give due weight to the views of the LADO, *KCSIE* and *WT* when making a decision about suspension and whether the circumstances warrant it or if alternative arrangements should be put in place

Physical Contact with Pupils

Staff should only exercise physical restraint as a last resort to prevent injury. Staff are allowed to comfort a child who is hurt/distressed in a manner appropriate to the age of the child.

Adults should not initiate any physical contact unnecessarily, and there should be clear boundaries:

- Children should not be picked up (unless medically necessary or being restrained)
- Adults should avoid being in a room alone with a child where the door is closed.

If you need to talk to a child, either leave a door open and position yourself within sight of the door, or ask another adult to be present.

Acceptable use of ICT Equipment

This should be read in conjunction with the Online Safety Policy and Acceptable Use Agreement for staff, Social Media Policy and GDPR/Data Protection Policy. Staff, Governors and Visitors should read and agree to 'Acceptable Use Agreement' annually. Staff owned mobile phones are not to be switched on in an area where children are present. Staff are requested to switch off their phones and any emergency calls to them are communicated through the school office. Any member of staff who has any queries or issues regarding the use of their mobile phone, must discuss this with the Headteacher. Staff

must not use their mobile phone as a camera in school. Any photograph/video must be taken using school equipment. Staff must only save images on school cameras or computers.

Whistleblowing – See Whistleblowing Policy

Whistleblowing is the mechanism by which staff can voice their concerns, without fear of repercussions. All staff have a duty to report any behaviour by a colleague which raises concern. Where staff have any concerns about another member of staff, these should be reported immediately to the Headteacher. Where the concern is about the Headteacher, it should be reported directly to the Chair of Governors. All concerns will be investigated thoroughly and confidentially, and appropriate action taken. Staff should refer to the whistle blowing procedures in the Child Protection and safeguarding policy. Further guidance https://www.gov.uk/whistleblowing

Resources

All staff should treat resources responsibly, and exercise due financial care All staff have a responsibility to look after the resources of the school. This includes:

- not wasting resources unnecessarily (including physical resources and those such as heat/electricity)
- following the principles of 'reduce, re-use, recycle' where appropriate
- signing out for items taken from the school premises (school iPads and laptops)
- All money handled should be clearly labelled and sent to the finance office by the end of the working day.

Parents as employees

- It is acknowledged that some staff also have children who attend the school. It is recognised that in these cases the staff fulfil a dual role of parent and employee.
- Parents as employees should ensure that they uphold boundaries between the two roles and that their behaviour does not constitute a conflict of interest. For example, they must maintain the same level of confidentiality despite social expectations.
- Parent-staff should discuss any inter-role conflict with their Phase Leader.
- Personal relationships may arise if your own children are friends with those in school, or when you have personal relationships with parents of children outside of school. Please use your professional judgement and pass on any concerns.

Compliance

All staff must complete the electronic Microsoft form sent from Maxine Ashton to confirm they have read, understood and agree to comply with this policy.

Appendix 1 Teacher standards

A teacher must:

1. Set high expectations which inspire, motivate and challenge pupils
    - establish a safe and stimulating environment for pupils, rooted in mutual respect
    - set goals that stretch and challenge pupils of all backgrounds, abilities and dispositions
    - demonstrate consistently the positive attitudes, values and behaviour which are expected of pupils.

2. Promote good progress and outcomes by pupils
    - be accountable for pupils' attainment, progress and outcomes
    - be aware of pupils' capabilities and their prior knowledge, and plan teaching to build on these
    - guide pupils to reflect on the progress they have made and their emerging needs
    - demonstrate knowledge and understanding of how pupils learn and how this impacts on teaching
    - encourage pupils to take a responsible and conscientious attitude to their own work and study.

3. Demonstrate good subject and curriculum knowledge
    - have a secure knowledge of the relevant subject(s) and curriculum areas, foster and maintain pupils' interest in the subject, and address misunderstandings
    - demonstrate a critical understanding of developments in the subject and curriculum areas, and promote the value of scholarship
    - demonstrate an understanding of and take responsibility for promoting high standards of literacy, articulacy and the correct use of standard English, whatever the teacher's specialist subject
    - if teaching early mathematics, demonstrate a clear understanding of appropriate teaching strategies.

4. Plan and teach well-structured lessons
    - impart knowledge and develop understanding through effective use of lesson time
    - promote a love of learning and children's intellectual curiosity
    - set homework in line with the school's homework policy and plan other out-of-class activities to consolidate and extend the knowledge and understanding pupils have acquired
    - reflect systematically on the effectiveness of lessons and approaches to teaching
    - contribute to the design and provision of an engaging curriculum within the relevant subject area(s).

5. Adapt teaching to respond to the strengths and needs of all pupils
    - know when and how to differentiate appropriately, using approaches which enable pupils to be taught effectively

4. Plan and teach well-structured lessons
    - have a secure understanding of how a range of factors can inhibit pupils' ability to learn, and how best to overcome these
    - demonstrate an awareness of the physical, social and intellectual development of children, and know how to adapt teaching to support pupils' education at different stages of development
    - have a clear understanding of the needs of all pupils, including those with special educational needs; those of high ability; those with English as an additional language; those with disabilities; and be able to use and evaluate distinctive teaching approaches to engage and support them.

6. Make accurate and productive use of assessment
    - know and understand how to assess the relevant subject and curriculum areas, including statutory assessment requirements
    - make use of formative and summative assessment to secure pupils' progress
    - use relevant data to monitor progress, set targets, and plan subsequent lessons
    - give pupils regular feedback, both orally and through accurate marking (in line with the marking and feedback Policy), and encourage pupils to respond to the feedback.

7. Manage behaviour effectively to ensure a good and safe learning environment
    - have clear rules and routines for behaviour in classrooms, and take responsibility for promoting good and courteous behaviour both in classrooms and around the school, in accordance with the school's Positive Behaviour policy

- have high expectations of behaviour, and establish a framework for discipline with a range of strategies, using praise, sanctions and rewards consistently and fairly
- manage classes effectively, using approaches which are appropriate to pupils' needs in order to involve and motivate them
- maintain good relationships with pupils, exercise appropriate authority, and act decisively when necessary.

8. Fulfil wider professional responsibilities

- make a positive contribution to the wider life and ethos of the school (including running/supporting co-curricular clubs or activities, during lunch, after school and at weekends)
- develop effective professional relationships with colleagues, knowing how and when to draw on advice and specialist support
- deploy support staff effectively
- take responsibility for improving teaching through appropriate professional development, responding to advice and feedback from colleagues
- communicate effectively with parents with regard to pupils' achievements and wellbeing.

Further details on the school's expectations and practice can be found in the Curriculum Policy, SEN Policy, Admissions Policy, Assessment, Recording and Reporting Policy, Equal opportunities Policy, Positive Behaviour Policy, Vision, Mission and Values statement.

Appendix 2

Low Level Concerns

We promote and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in our Code of Conduct are constantly lived, monitored and reinforced by all staff. The school deals with all concerns about adults working in or on behalf of the school appropriately and promptly.

The school seeks to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

We seek to

- ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
- empower staff to share any low-level concerns with the Headteacher
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weaknesses in the school's safeguarding system.

This applies to all staff at BPS.

Defining a Low-Level Concern

A low-level concern is one that does not meet the harm threshold as stated in the school's Safeguarding Policy. That is, when anyone working in a school (including volunteers, supply staff and contractors) has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside school posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within Appendix F of the School's Safeguarding Policy, 'Allegations Regarding Staff (or volunteers)'. These should be reported to the Headteacher without delay.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e. they believe it could be a concern) – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Responsibilities of staff

It is important that all staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for new staff.

It is crucial that any concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headteacher. This should be done without delay.

Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors (whose contact details can be found in the School's Safeguarding Policy document).

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been contrary to the school's code of conduct and expectations, should self-refer to the Headteacher.

Dealing with Low-Level Concerns

All low-level concerns may be shared verbally with the Headteacher in the first instance but must then be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible.

Where the low-level concern is provided verbally, the Headteacher should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed and dated. Records will remain confidential in accordance with the school's Data Protection policies and GDPR.

Responding to a Low-Level Concern

The Headteacher will in the first instance satisfy themself that it is a low-level concern and should not be reclassified as a higher-level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:

a) the threshold is met for a higher-level concern/allegation
b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
c) there is other information which when taken into account leads to a higher-level concern/allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Headteacher will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's HR manager.

Monitoring of Low-Level Concerns

The Headteacher will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

a) the concern (or group of concerns) has been reclassified as a higher-level concern
b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure

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