Woolmore
Primary School

Staff
Code of Conduct
and
Low-Level
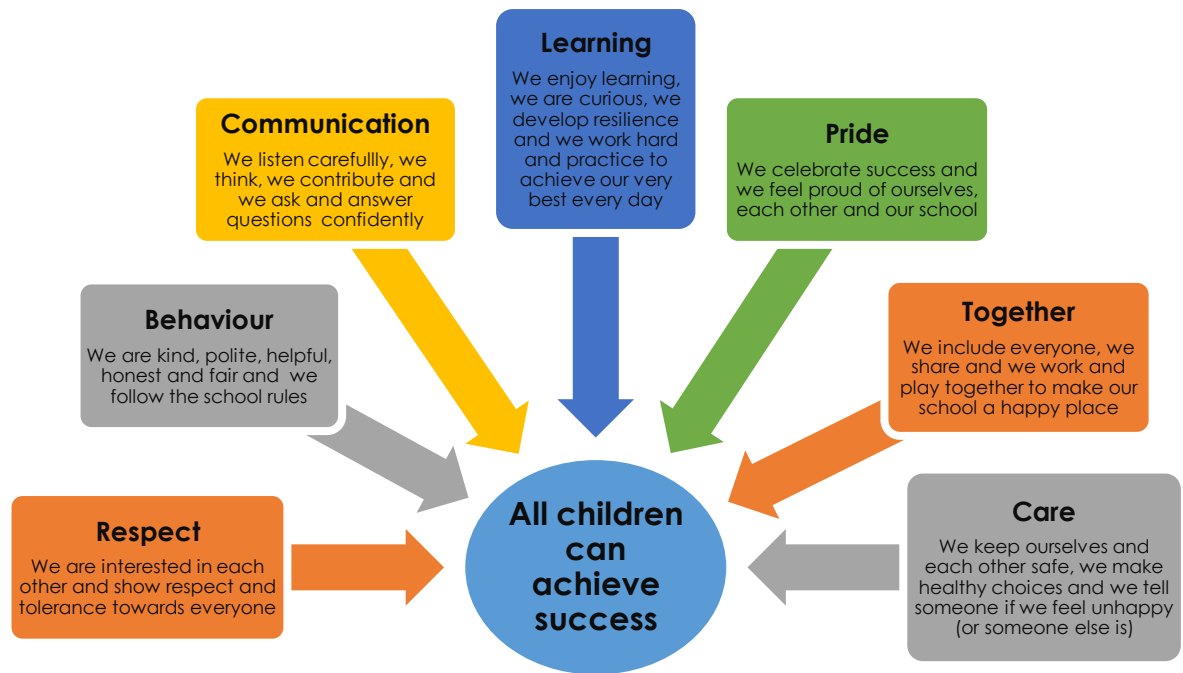# Concerns Policy
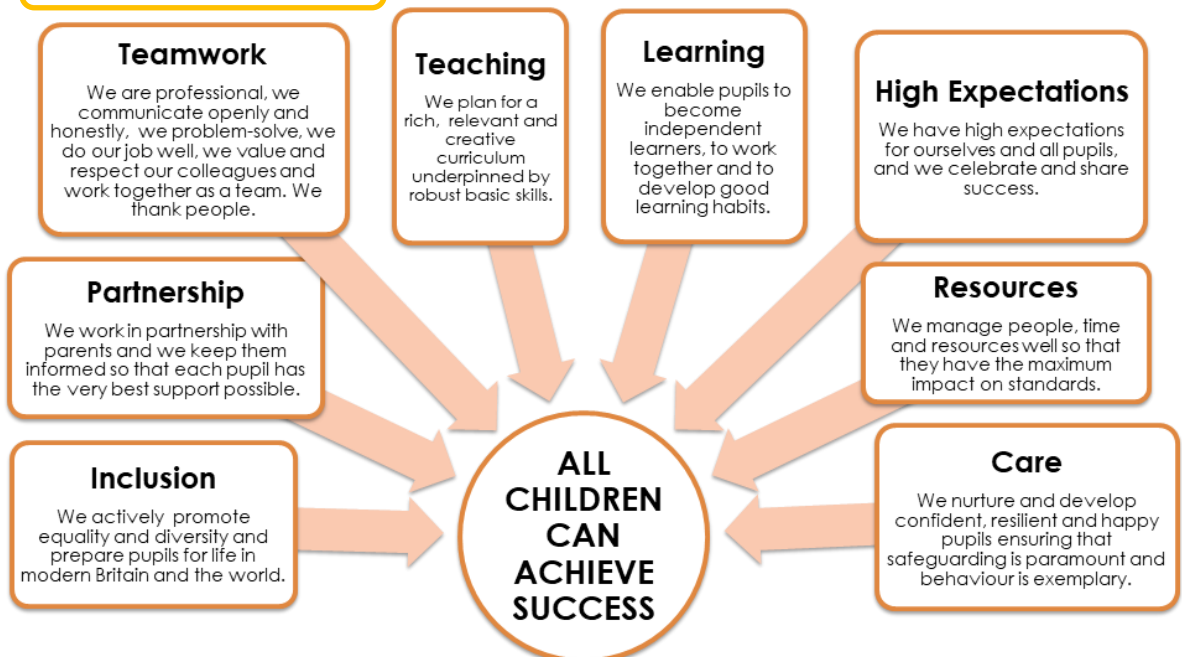
September 2021

Contents

Our School Values

It is vital that all adults who work at Woolmore read, understand, and can demonstrate full commitment to our School Values. We have three layers: for pupils, for staff and for leaders and governors. They interleave and demonstrate what we stand for.
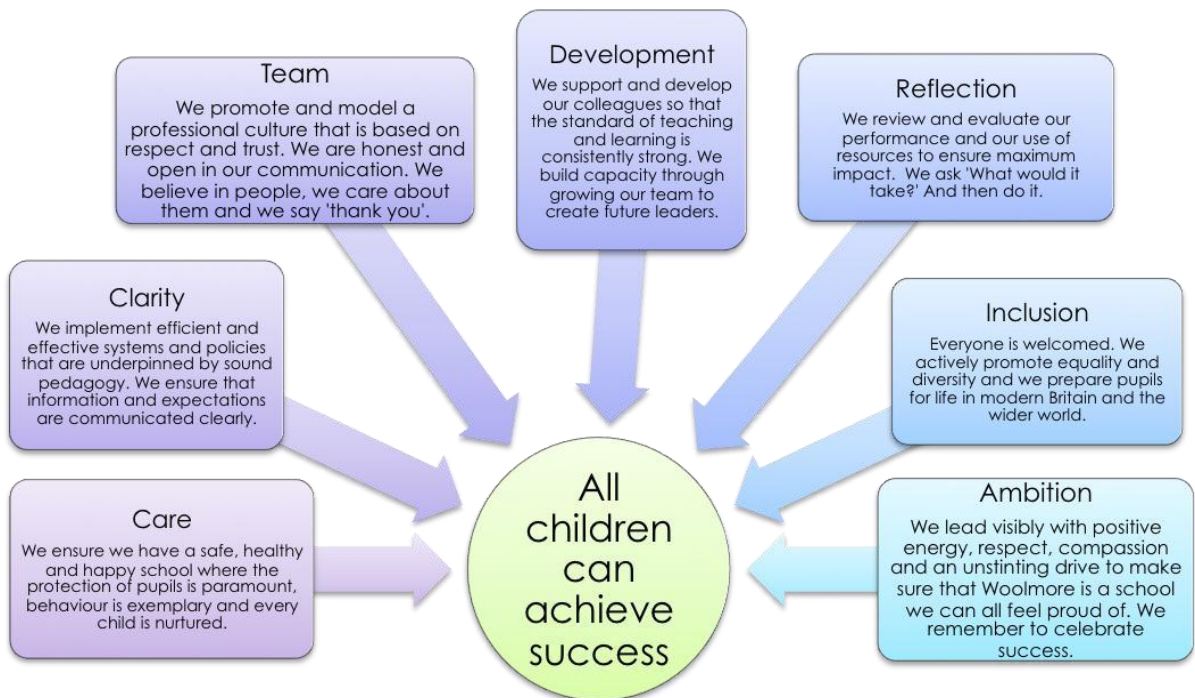
Our Values for Pupils

Learning
We enjoy learning, we are curious, we develop resilience and we work hard and practice to achieve our very best every day

Communication
We listen carefullly, we think, we contribute and we ask and answer questions confidently

Pride
We celebrate success and we feel proud of ourselves, each other and our school

Behaviour
We are kind, polite, helpful, honest and fair and we follow the school rules

Together
We include everyone, we share and we work and play together to make our school a happy place

Respect
We are interested in each other and show respect and tolerance towards everyone

Care
We keep ourselves and each other safe, we make healthy choices and we tell someone if we feel unhappy (or someone else is)

All children can achieve success

Our Values for Staff

Teamwork
We are professional, we communicate openly and honestly, we problem-solve, we do our job well, we value and respect our colleagues and work together as a team. We thank people.

Teaching
We plan for a rich, relevant and creative curriculum underpinned by robust basic skills.

Learning
We enable pupils to become independent learners, to work together and to develop good learning habits.

High Expectations
We have high expectations for ourselves and all pupils, and we celebrate and share success.

Partnership
We work in partnership with parents and we keep them informed so that each pupil has the very best support possible.

Resources
We manage people, time and resources well so that they have the maximum impact on standards.

Inclusion
We actively promote equality and diversity and prepare pupils for life in modern Britain and the world.

Care
We nurture and develop confident, resilient and happy pupils ensuring that safeguarding is paramount and behaviour is exemplary.

ALL CHILDREN CAN ACHIEVE SUCCESS

3

Team

We promote and model a professional culture that is based on respect and trust. We are honest and open in our communication. We believe in people, we care about them and we say 'thank you'.

Development

We support and develop our colleagues so that the standard of teaching and learning is consistently strong. We build capacity through growing our team to create future leaders.

Reflection

We review and evaluate our performance and our use of resources to ensure maximum impact. We ask 'What would it take?' And then do it.

Clarity

We implement efficient and effective systems and policies that are underpinned by sound pedagogy. We ensure that information and expectations are communicated clearly.

Inclusion

Everyone is welcomed. We actively promote equality and diversity and we prepare pupils for life in modern Britain and the wider world.

Care

We ensure we have a safe, healthy and happy school where the protection of pupils is paramount, behaviour is exemplary and every child is nurtured.

All children can achieve success

Ambition

We lead visibly with positive energy, respect, compassion and an unstinting drive to make sure that Woolmore is a school we can all feel proud of. We remember to celebrate success.

Aims, scope and principles of this policy

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

- By creating this policy, we aim to ensure our school is an environment where everyone feels safe, respected and happy.

- The governing body of Woolmore Primary School will foster a culture of the highest professional standards. This Code of Conduct sets out the standards expected and the duty upon staff, volunteers and governors to abide by.

- All staff, including agency staff, governors and volunteers have a duty to keep pupils safe and to be protected from harm. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils as well as adult behaviour that demonstrate integrity, maturity and good judgment.

- This Code of Conduct will help to safeguard all staff, governors and volunteers from being maliciously, falsely or mistakenly suspected or accused of professional misconduct in relation to pupils.

- Staff, governors and volunteers must feel able to raise issues of concern and everyone must fully recognise their duty to do so, particularly in terms of child protection. A member of staff who, in good faith, "whistle-blows" or makes a public interest disclosure will have the protection of the relevant legislation (see Woolmore Whistle Blowing Policy).

- This Code of Conduct cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to pupils. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the pupil where no specific guidance has been given.

- Adults are expected to make responsible and informed judgments about their own behaviour in order to secure the best interests and welfare of the pupils in their charge.

- Many of the principles in this Code of Conduct are based on the Teachers' Standards 2012.

- School staff have an influential position in the school and will act as role models for pupils by consistently demonstrating high standards of behaviour. We expect all staff (including agency staff), governors and volunteers to act with 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 staff disciplinary procedures.

Legislation and guidance including Covid-19

- We are required to set out a staff Code of Conduct under regulation 7 of The School Staffing (England) Regulations 2009.

- In line with the statutory safeguarding guidance 'Keeping Children Safe in Education (2021)', we should have a staff code of conduct, which should cover acceptable use of technologies, staff/pupil relationships and communications, including the use of social media.

- This is particularly important as expectations for staff are evolving with more children necessarily being taught at home for a proportion of their school year due to potential exposure to Covid 19.

- It is now an expectation that schools prepare a plan to successfully deliver blended learning to pupils - requiring a greater reliance on technology for both teachers and children. Furthermore this policy is written in conjunction with the continually updated and bespoke COVID 19 Risk Assessment for the school, which outlines expectations for staff relating to professional conduct; behaviours expected of staff to ensure the risk of transmission is reduced within the school environment.

- The 'Standards for Teachers came into force on 1 September 2012. They replace the previous standards for qualified teacher status (QTS) and the core professional standards.

- Part two of the document entitled 'Personal and Professional Conduct' states the following:

A teacher is expected to demonstrate consistently high standards of personal and professional conduct and the following statements define the behaviour and attitudes which set this required standard for conduct throughout a teacher's career:

- *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;*
- *ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law;*
- *teachers must have 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;*
- *teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.*

- *The full document can be viewed at: http://www.education.gov.uk/schools/teachingandlearning/reviewofstandards*

- This Code of Conduct forms part of the school's disciplinary rules for staff. A serious breach of the code will be regarded as gross misconduct. A less serious breach may result in a disciplinary warning.

- Where an allegation of abuse is made against a member of staff the governing body will follow the guidance set out in Keeping Children Safe in Education 2021; Working Together to Safeguard Children 2018 and Tower Hamlets' Local Safeguarding Arrangements. This guidance explains how to manage allegations that might indicate that a person is unsuitable to continue to work with children in their present position, or in any capacity. It will be used where it is alleged that a member of staff - including agency staff - a volunteer or a governor has:

  • behaved in a way that has harmed a child, or may have harmed a child;
  • possibly committed a criminal offence against or related to a child;
  • behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  • behaved or may have behaved in a way that indicates they may not be suitable to work with children. (The last bullet point includes behaviour that may have happened outside of school, including relationships with others, that make an individual unsuitable to work with children, this is known as transferable risk.
• Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken, and if in doubt, advice sought from the LADO.

Chapter 7 of Part A of the London Child Protection Procedures (LCPP) also makes it clear that an allegation can relate to an adult's behaviour outside of work, and their relationships with others, if they:
• have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
• have, as a parent or carer, become subject to child protection procedures;
• are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

Low Level Concerns Policy - Concerns that do not meet the harm threshold / low level concerns

https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf

This low-level concerns policy aims to be presented in a simple and clear way. Below you will read an introduction to the concept of low-level concerns and the importance of sharing low-level concerns, an explanation of what the policy is, what its purpose is and what its aims are.

This low level concerns policy enables all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour with the Headteacher or DSL. Safeguarding and promoting the welfare of children is everyone's responsibility.

This low-level concerns policy applies to any adult working in or on behalf of Woolmore Primary. This enables low-level concerns to be self-reported by and/or shared about them. KCSIE states that where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

This policy aims to ensure all staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines.

The purpose of the policy is also to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

We understand that organisational child sexual abuse is an increasingly well-documented and understood phenomenon. It is rare to find cases where the abuse occurred in the absence of preceding grooming by the offender, and whilst not always, it is usually the case that such preparatory conduct was observed and regarded as questionable at the time by others. It is not of course just children who are groomed but also, as multiple cases demonstrate, the potentially protective adults and systems around them. Often a striking feature is that such conduct was not shared with the relevant individual at the organisation until after substantive abuse was alleged against the offender. In other respects, potentially questionable conduct, even where shared, is consistently shown not to have either been recorded or available for evaluation as part of a history or pattern of behaviour, or not to have been escalated when a pattern of such behaviour emerged.

Common factors in organisational child sexual abuse include (Marcus Erooga review of 20 serious case reviews relating to such abuse in the UK from 2010-2016):

(a) failure of staff and management to understand and implement their safeguarding policies (including around sharing concerns);
(b) the importance of staff and management understanding the dynamics of organisational abuse (including grooming); and
(c) the significance of organisational culture to minimise risk.

Grooming behaviours included direct use of authority to offend, using material or practical benefits for victims, providing support for isolated children, favouring particular children, and use of alcohol, videos or sexual imagery amongst others.

The method of commencing the abuse included the erosion of boundaries, slow progression to abuse, use of trust and authority, meeting the child's needs (including physical and emotional), and developing relationships with the child's family. At Woolmore we understand

that these concepts are straightforward but that staff do not understand them unless we ensure there is training based on real life cases.

Preferential, Opportunistic and Situational offenders

We also understand that the research questions the view that all offenders are *preferential*, suggesting instead that whilst some are undoubtedly preferential, others may be considered to be *opportunistic* and some are *situational*. Preferential offenders are those who have a conscious desire to sexually abuse children, and who either do not see, or are not easily deterred, by obstacles. Opportunistic offenders are those who abuse because potential victims are available and potentially vulnerable, and the organisational setting either inadvertently facilitates, or fails to prevent, abusive activity. Situational offenders are those whose propensity to abuse is previously unknown or unacknowledged, and their offending is specific to the set of organisational factors which potentiates their offending.

The importance of establishing and preserving boundaries

At Woolmore we understand the concept of a 'slippery slope' of boundary violations towards abuse, and that there are many stages on the slippery slope towards the breach of a boundary within a relationship. Sometimes initial infringements are part of a grooming process but at other times they are made innocently and with good intention. However, once boundaries are breached it then becomes more difficult to restore the relationship to one in which proper boundaries are respected. Organisations in which boundaries are adhered to in every respect in which staff perform their role are likely to be the safest environments for children.

Specific Behaviours

Research emphasises the need to understand that there is no one profile to describe everyone who abuses a child and the importance, therefore, of a focus instead on specific behaviours.

We educate adults to be informed about, and to identify, concerning, problematic or inappropriate behaviour, rather than think they can recognise dangerous people, they can be prepared to act when they observe behaviour which violates a staff code of conduct. They can draw attention to '*the hundreds of small comments, harassments, emotional and physical boundary violations, and other signs that may precede [child] sexual abuse*' – what may be considered in the broadest sense to be [part of a conscious, or an unwitting] grooming process.

Our Code of Conduct Policy aims to be clear and robust and there is a commitment from leadership to adhere to, enforce and reinforce the staff code of conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status.

At Woolmore staff are taught the staff code of conduct so that everyone is familiar with it, and clear on the standard of behaviour expected of them – it is a lived document, seen to apply to all levels of our school. Staff are also trained on specific behaviours to be aware of, and encouraged and empowered to share any concerns about behaviour that is not appropriate. Intrinsic to this is discussing, during training, real life examples of the consequences of failing to report.

"It is not whistleblowing, which is the safety net at the end of the process, but mechanisms that allow the confidence to speak out on a day-to-day basis. How do you create that culture? You need a robust framework, policy, training, support and leadership to facilitate dialogue and instil it." (Sam Monaghan, former Corporate Director Children's Services, Barnardo's)

The aim of our code of conduct policy is to ensure staff understand that we take action to minimise the risk of *situational* offending. This includes:
(a) reducing the opportunity and acceptability of concerning, problematic or inappropriate behaviour;
(b) increasing the effort required to offend;

(c) increasing the risk and perception of the risk of detection;
(d) ensuring there are robust and effective staff support systems in place;

At Woolmore we understand that it is dangerous to over-rely on DBS or overseas criminal records checks – they are essential (where roles require them, and as a matter of compliance) but are not a silver bullet. A clear DBS check simply confirms that an individual has not been discovered to present a risk to children; it is not predictive about potential risk. Research shows that the majority of organisational child sex offenders did not have a previous criminal record at the time they offended, although they may subsequently be found to have had numerous previous victims.

The powerful effect of our culture – *'the way we do things around here'*

At Woolmore we understand the powerful effect of organisational culture – and the importance of clarity and congruence about values and expectations. Culture can best be described as '**the way we do things around here**'. We believe in creating a robust, holistic safeguarding culture that everyone endorses and is committed to. Culture forms the context within which people judge the appropriateness of their behaviour. An organisation's culture will influence human behaviour and human performance at work, and it is vital to recognise the danger of cultural slippage. A staff code of conduct which is understood, accepted and followed by all adults associated with the organisation is integral to this, and strong governance and leadership are vital.

What can we learn from serious case reviews?

"…I would like to stress the overwhelming importance of two things for organisations in protecting children – a culture of openness, including a willingness to recognise and accept that abuse could happen in any organisation and a robust structure to support the effective reporting and handling of concerns about behaviour." (Dame Moira Gibb)

Sharing, recording and handling concerns

The low-level concerns policy gives us a formal mechanism for sharing, recording or handling low-level concerns. When concerns are shared they are shared with the same people so each concern will not be dealt with in isolation. One person will be aware of all of the concerns, and therefore will be able to 'join the dots,' and identify a pattern of inappropriate behaviour.

At Woolmore staff are taught to value the importance of sharing, recording and handling low-level concerns, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified as soon as possible, and staff can be confident that appropriate action can and will be taken swiftly in response.

Implementing policy

At Woolmore we understand the way in which our low-level concern policy is implemented is key. Our school leaders must ensure that their focus is on designing our policy which is tailored to our school and implementing it in a way which will achieve 'buy in' from all staff. Equally, we recognise that leaders play a key role in communicating the assumptions, values, beliefs, and norms they expect members of their organisation to exhibit. Simply put, if our leadership is not seen to adhere to and model the expected values and behaviour of the organisation, our written low-level concerns policy is unlikely to be effective.

Where do concerns arise

We understand that concerns may arise in several ways and from a variety of sources; complaints, suspicion, disclosure made by a child, parent or other adult within or outside the school, or as a result of vetting check undertaken.

We promote an open and transparent culture in which all concerns about all adults working in or on behalf of our school are dealt with promptly and appropriately. We work to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This encourages an open and transparent culture enabling us to identify concerning problematic or inappropriate behaviour early, minimize the risk of abuse and ensure all adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries and in accordance with our ethos and values. If this is not adopted, we risk enabling the creation of further victims through missed opportunities to identify and effectively intervene in concerning, problematic or inappropriate behaviour

Low Level Concerns

Defining a low-level concern

Low-level concern is a clear and comprehensible term used to neutralise the act of sharing a concern. It neither meets the allegation threshold nor is otherwise serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

It is the responsibility of all staff to be clear about what appropriate behaviour is and feel confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour in themselves and others.

At Woolmore we aim for all staff and volunteers to feel empowered to share any low-level concerns with the Headteacher or the DSL and for all staff to interpret the sharing of such concerns as a neutral act. All staff must understand that any such concerns, including those which do not meet the harms threshold need to be shared responsibly and with the right person and recorded and dealt with appropriately. By doing so this should also protect those working in or on behalf of our school from potential false allegations or misunderstandings.

A low level concern is any concern – no matter how small, and even if no more that causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of our 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 is 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;

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 a specific circumstances, through to that with is ultimately intended to enable abuse.

All staff understand that unprofessional behaviour will be addressed and the individual will be supported to correct it at an early stage.

All staff can expect a responsive, sensitive and proportionate handling of such concerns when they are raised.

We understand that this policy and process will help in identifying any weaknesses in our school and our safeguarding systems.

Sharing low-level concerns - *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*

Low-level concerns about a staff member, supply staff, volunteer or contractor should be reported. At Woolmore these concerns would be shared with the *Headteacher / Deputy Headteacher and DSL*. With regards reports about supply staff or contractors their employers should be notified so any potential patterns of inappropriate behaviour can be identified.

Having one consistent recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is possibly lost.

It is important that low-level concerns are shared with the Headteacher and DSL as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it should also be emphasised that it is never too late to share a low-level concern.

If the Headteacher or DSL is absent for any reason, low-level concerns should be shared with the Deputy Head teacher who should ensure that they inform the Headteacher and DSL immediately on their return.

If any low-level concern relates to the behaviour of the Headteacher it should be dealt with in accordance with paragraph 74 of KCSIE, and if it relates to the DSL, it should be shared with the Headteacher.

If the staff member who raises the concern does not wish to be named, then we would respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, we would never promise anonymity to members of staff who share low-level concerns. Where possible, we would try to encourage staff to consent to be named, as this will help to create a culture of openness and transparency.

At Woolmore staff are given the option of sharing their low-level concern verbally with the Headteacher or the Safeguarding Lead in the first instance or of providing them with a written summary of it. Organisations may wish to provide staff with the option of completing a simple low level concerns form, an example of which is appended at ==Appendix A==

Where the low-level concern is provided verbally, the Headteacher or Safeguarding Lead will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion.

Sound professional judgement should be exercised by them in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised.

If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

All low-level concerns will be recorded in writing. This record will include details of the concern, the context in which the concern arose and action taken. The name of the individual sharing concerns will be noted unless they wish to remain anonymous. Records are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning or problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified we decide on the best course of actions either through disciplinary procedure or where it moves from a concern to meeting the harms threshold, a referral to the LADO.

Identifying weaknesses in the our school's safeguarding system

Reflection and consideration will also be given to the wider cultural issues within our school that enabled the behaviour to occur and where appropriate we would revise relevant polices and deliver relevant training to minimize the risk of it happening again.

Individual records will be retained until the individual leaves our employment. Low level concerns would not be included in references unless they relate to issues normally included in references for example poor performance or misconduct. However, where a low-level concern or group of concerns has met the threshold for a referral to the LADO and is found to be substantiated it should be referred to in the reference.

Valuing Self-reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour. KCSIE states that schools should ensure that they create an environment where staff are encouraged and feel confident to self-refer.

We understand it is our responsibility to create an environment where staff are encouraged and feel confident to self-refer where 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 the expected professional standard.

Responding to low-level concerns

At Woolmore we aim to be responsive, sensitive and proportionate in our handling of such concerns when they are raised.

The headteacher will 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

This information will be used to help categorise the type of behaviour and determine what further action may need to be taken. This would all be recorded along with the rationale for decisions and action taken.

Once the Headteacher or DSL has received the low-level concern, they should (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

1) speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;

2) speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

3) speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

4) review the information and determine whether the behaviour

> (i) is entirely consistent with their staff code of conduct and the law,
> (ii) constitutes a low-level concern,
> (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary,
> (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies, or
> (v) in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies;

If the headteacher, deputy head or DSL were in any doubt whatsoever, they are committed to seek advice from the LADO - on a no-names basis if necessary.

Record Keeping

The Headteacher, Deputy Head and DSL understand their responsibility to make appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);

- all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);

- their determination;

- the rationale for their decision; and

- any action taken.

The Headteacher/Principal's or Safeguarding Lead's approach should also be informed by the following:

If it is determined that the behaviour is entirely consistent with the organisation's staff code of conduct and the law:

- it will still be important for the Headteacher/Principal or Safeguarding Lead to update the individual in question and inform them of the action taken as above;

- in addition, the Headteacher/ Principal or Safeguarding Lead should speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law;

such a situation may indicate that:

- the staff code of conduct is not clear;
- the briefing and/or training has not been satisfactory; and/or
- the LLC policy is not clear enough.

If it is determined that the behaviour constitutes a low-level concern it should also be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst on the other hand, protecting staff from any potential false allegations or misunderstandings.

Any investigation of low-level concerns should be done discreetly and on a need-to-know basis. Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training.

In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening (Miller & Rollnick, 1991).

The headteacher, deputy head or DSL would lead a 'values-based conversation', and help maintain a positive professional relationship with the member of staff concerned. Such an approach is characterised by a spirit of genuine enquiry. For example, "I am sure you subscribe to our organisational values, so help me understand how you came to behave in a way which is not in keeping with those, so that we can understand what actions or support you might need so that we can both be confident that it will not happen again..;"

Any such conversation should 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 which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

Some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher or DSL should also consider whether this is the case – by referring to our disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary.

Equally, we also understand that it is essential that there is close liaison and appropriate information sharing between the Headteacher or Safeguarding Lead and HR, so that a holistic view of the individual can be taken.

We understand that in the first instance we exercise our professional judgement and, if in any doubt, we seek advice from other external agencies including the LADO;

However, if it is determined that the behaviour:
whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary, then action (if/as necessary) should be taken in accordance with the LADO's advice; or

when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation, then it should be referred to the LADO/other relevant external

agencies, and in accordance with the organisation's safeguarding policy or, if separate, managing allegations against staff policy, and Part 4 of KCSIE (which, whilst applicable to schools and colleges in England, also constitutes best practice for other organisations); and all organisations (including schools and colleges in England) are, in any event, required to comply - in all matters relating to safeguarding - with the relevant procedures and practice guidance stipulated by their Local Safeguarding Partnership.

How should low-level concerns be held?

Organisations should retain all records of low-level concerns (including those which are subsequently deemed by the Headteacher or Safeguarding Lead to relate to behaviour which is entirely consistent with the staff code of conduct) in *a central low-level concerns file* (either electronic or hard copy).

Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record, and with a timeline alongside (an example of which is appended at Appendix B). These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Headteacher or Safeguarding Lead, and the individual they report to; and senior HR officer, and the individual they report to (e.g. Head of HR).

There may be circumstances where a low-level concern (or group of concerns) requires reclassification following determination by the Headteacher or Safeguarding Lead, and/or recording on the relevant staff member's personnel file. In such case, we still consider it vitally important to retain the low-level concern(s) (as originally shared) on the central low-level concerns file, as well as on the personnel file. That is because the value of a central low-level concerns file risks being diluted if potentially significant contextual information is removed, or divided across two separate files.

Specifically, if a referral is made to the LADO/other external agencies where the behaviour in question: (i) had not originally been considered serious enough to consider a referral to the LADO but merited consulting with and seeking advice from them; (ii) is determined to meet the threshold of an allegation when considered with any other low-level concerns that have previously been raised about the same individual; or (iii) in and of itself meets the threshold of an allegation then records relating to the behaviour should be placed and retained on the staff member's personnel file, whilst also being retained on the central low-level concerns file.

In the case of (i), a duplicate of all previous records of low-level concerns relating to the same individual from the central low-level concerns file should be placed in the staff member's personnel file.

Material on the personnel file should be retained in accordance with Part 4 of KCSIE – which requires schools in England to produce a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept on the confidential personnel file of the staff member, and a copy provided to them.

Review of the central low-level concerns file

The Headteacher or Safeguarding Lead should review the central low-level concerns file periodically 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 of these reviews should be made.

Should a low-level concern be referred to in a reference?

KCSIE prohibits schools from referring to unsubstantiated, malicious or false allegations in references. Only safeguarding allegations that have been substantiated should be included in references. KCSIE states that:

- *where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference*

- *low level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.*

The role of the Governance Body

The Headteacher or Safeguarding Lead should regularly inform the Governance Body about the implementation of the low-level concerns policy and any evidence as to its effectiveness. For example, by including reference to it in any safeguarding reports, and providing any relevant data. The Governance Body should also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

Principles of Professional Practice

All staff, governors and volunteers as appropriate to the role and/or job description, must:

- place the well-being and learning of pupils at the centre of their professional practice

- have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances

- treat pupils fairly and with respect, take their knowledge, views, opinions and feelings seriously, and value diversity and individuality

- model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people

- respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education

- seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and well-being in and out of school

- reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues.

Confidentiality

- Members of staff and governors may have access to confidential inform about pupils in order to undertake their responsibilities. In some circumstances the information may be highly sensitive.

- Confidential personal information about a pupil or her / his family must never be disclosed to anyone other than on a need-to-know basis.

- In circumstances where the pupil's identity does not need to be disclosed the information should be shared anonymously.

- Information must never be used to intimidate, humiliate or embarrass the pupil.

- Information sharing is vital in identifying and tackling all forms of abuse and neglect.

- As part of meeting a child's needs, it is important for all staff to recognise the importance of information sharing between practitioners and local agencies including the three safeguarding partners, other organisations, agencies and practitioners as required.

- School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

- The governing body and all staff are aware that the Data Protection Act 2018 and the General Data Protection Regulation (GDPR 2018) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- We ensure relevant staff have due regard to the key data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

  - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
  - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
  - for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

  - If a member of staff is in any doubt about the storage of sharing of information, she/he must seek guidance from a senior member of staff.
  - Any media or legal enquiries must be passed to the Head Teacher.

Safeguarding and Child Protection

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

- Staff will familiarise themselves with our Safeguarding and Child Protection Policy and procedures, taking responsibility for their own understanding of the processes to follow if they have concerns about a child.

- Hard copies of our **Safeguarding Policy** are available on request and electronic copies are emailed to staff. New staff will be signposted to this as part of their induction.

Staff/pupil relationships
Staff will observe proper boundaries with pupils 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 staff members and pupils must spend time on a one-to-one basis, staff will ensure that:
- this takes place in a public place that others can access

- others can see into the room
- a colleague or line manager knows this is taking place.

- Staff should generally avoid contact with pupils outside school hours.

- Personal contact details should not be exchanged between staff and pupils. This includes requests for friendships on social media platforms such as Instagram, Twitter or Facebook.

- A relationship between a member of staff, a volunteer or a governor and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of pupils and all adults have a responsibility to ensure that the unequal balance of power is not used for personal advantage or gratification. It is important to recognise that women as well as men may abuse a position of trust.

- Adults must not use their position to form or promote relationships with children (whether current pupils or not), that are of a sexual nature, or which may become so.

- Adults should maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. They should report any incident with this potential.

Physical Contact and Personal Privacy

- There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role.

- When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background.

- It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.

- Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. If a member of staff or volunteer believes that an action could be misinterpreted, the incident and circumstances should be reported.

- Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEND). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the pupil's permission and parent's permission before initiating contact. Staff should listen, observe and take note of the pupil's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the pupil for the minimum time necessary.

- There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Staff should always remain self-aware in order that their contact is not threatening, intrusive or subject to misinterpretation. For the time-being staff must also heed guidance and additional considerations detailed in the updated COVID 19 school risk assessment which clarifies adjustments necessary when being in close proximity to a pupil. This includes reference to situations when a teacher is providing comfort or reassurance or necessary medical aid.

- Where a member of staff has a particular concern or need for clarification about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.

- Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment.

- Staff with a job description which includes intimate care duties will have appropriate training and written guidance which has included an agreement signed by the pupils

carers. No other member of staff or volunteer should be involved in intimate care duties except in an emergency.

Gifts

- It is against the law for public servants to take bribes.

- Staff need to take care that they do not accept any gift that might be construed by others as a bribe or lead the giver to expect preferential treatment.

  There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value.

  Personal gifts must not be given to pupils. This could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the school's behaviour policy, recorded, and not based on favoritism.

  If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, this should be reported to their line manager or the headteacher.

Communication, blended learning and social media

- School staffs' social media profiles should not be available to pupils. If they have a personal profile on social media sites, they may decide not to use their full name, as pupils may be able to find them. Staff should consider using a first and middle name instead and set public profiles to private.

- Staff should not attempt to contact pupils or their parents via social media, or any other means outside school, in order to develop any sort of relationship.

- Staff will not make any effort to find pupils' or parents' social media profiles. This includes social networking sites such as Instagram, Snapchat, and Facebook or via personal blogs.

- Even if a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgment in making a response and be aware that such social contact in person, by phone or on the internet could be misconstrued and may place the member of staff in a very vulnerable position.

- Staff and volunteers must not give their personal details such as home/mobile phone number or e-mail address to pupils unless the need to do so is agreed with senior management.

- Staff will ensure that they do not post any images online that identify children who are pupils at the school without their consent.

- Staff must be aware of the school's Online Safety Policy which outlines expectations for staff when engaging with children in the context of blended learning. This *will* require staff to email and message pupils using learning platforms such as Purple Mash. Whilst communicating with children in this context staff are expected to demonstrate integrity, maturity and good judgment.

- It is necessary that staff also find novel ways to communicate with agencies and parents whilst restrictions are in place due to Covid-19 and face to face meetings are restricted. This is likely to mean staff will use platforms such as Microsoft 365 and Zoom to attend or host meetings. In these situations, expectations for staff are in line with those outlined for communication in general (see above).

- Staff are expected to only conduct virtual parent meetings with the support of a member of SLT. A member of SLT is always expected to be present during the meeting.

- School staff must be aware of and understand that disciplinary action could be taken if any comments or behaviour online is found to lower the reputation of the school.

- All staff and volunteers must continue to act immediately on any concerns they have about a child or the conduct of an adult. It is vitally important staff do this for children who have

to remain temporarily at home whether in isolation or quarantine. Similarly, where there are concerns about adults working remotely the schools Safeguarding Policy should be referred to and a member of the Safeguarding Team notified immediately.

Behaviour Management and Physical Intervention

- All pupils have a right to be treated with respect and dignity.

- Corporal punishment is unlawful in all schools. Staff and volunteers must not use any form of degrading treatment to punish a pupil.

- The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation.

- Shouting aggressively (or otherwise, except in an emergency) or hectoring is not acceptable in any situation.

- Deliberately intimidating pupils by overweening physical presence is not acceptable in any situation.

- The circumstances in which staff can physically intervene with a pupil are covered by the 1996 Education Act. Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline.

- Staff should have regard to the health and safety of themselves and others.

- Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. See the Behaviour Policy for additional details re the ways pupils and staff are safeguarded if physical intervention is necessary. It also outlines adaptations made in response to the necessary social distancing required between staff and pupils to further reduce the risk of the transmission of Covid-19.

One to One Situations and Meetings with Pupils

- Staff working in one-to-one situations with pupils are more vulnerable to allegations. Staff must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and pupils are met.

- Managers should undertake a risk assessment in relation to the specific nature and implications of one-to-one work for each worker and pupil. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of the school and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.

- Pre-arranged meetings with pupils away from the school premises or on the school site when the school is not in session are not permitted unless approval is obtained from their parent/ guardian and the head teacher or other senior colleague with delegated authority.

Educational Visits and School Clubs

- Staff and volunteers should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting, or after school activity. Staff and volunteers remain in a position of trust and the same standards of conduct apply.

- The school has a policy on educational visits which forms part of this Code of Conduct.

Curriculum

- Some areas of the curriculum can include, or raise subject matter, which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials

cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. The lesson plan should highlight areas of risk and sensitivity.

- The governing body is required by law to publish their policy on Health, Relationships and Sex Education (HRSE), as well as the elements of the science or PSHE curriculum where elements of Sex Education are included. Adherence to this policy forms part of the Code of Conduct.

Acceptable use of technology

- Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. The Data Protection Act 2018 affects the use of photography. An image of a child is personal data, and it is therefore, a requirement under the Act that consent is obtained from the parent of a child for any images made such as those used for school web sites, productions or other purposes.

- Staff need to be aware of the potential for such images to be misused to create indecent images of children and/or for 'grooming' purposes. Careful consideration should be given as to how these activities are organised and undertaken. Regard needs to be given when they involve young or vulnerable pupils who may be unable to question why or how the activities are taking place.

- Pupils who have been previously abused in this way may feel threatened by the use of photography, filming etc. in the teaching environment. Parents and carers who take photos/videos during assemblies, sports competitions or events should be reminded to only photograph or record their children where possible. In the event of them photographing or recording other children they must not upload it onto the internet in any form including social media of any type.

- Staff should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to consider the wishes of the child, remembering that some children do not wish to have their photograph taken.

- Using images of pupils for publicity purposes will require the age-appropriate consent of the individual concerned and their legal guardians. Images must not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.

When using a photograph, the following guidance must be followed:

- if the photograph is used, avoid naming the pupil

- if the pupil is named, avoid using the photograph

- images must be securely stored and used only by those authorised to do so

- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded

- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose

- ensure that all images are available for scrutiny in order to screen for acceptability and be able to justify the images made

- do not take, display or distribute images of pupils unless there is consent to do so. The school has additional guidance on the use of images which includes a consent form. The guidance forms part of this Code of Conduct.

- The school has a separate Online Safety Policy which includes content such as *safe internet use, electronic communication and security* which forms part of this Code of Conduct.

- Staff will not use technology in school to view material that is illegal, inappropriate or likely to be deemed offensive. This includes but is not limited to sending obscene emails, gambling and viewing pornography or other inappropriate content.

- Staff will not use personal mobile phones and laptops, or school equipment for personal use, in school hours or in front of pupils. They will also not use personal mobile phones or cameras to take pictures of pupils. The school has the right to monitor emails and internet use on the school IT system.

Confidentiality

In the course of their role, members of staff are often privy to sensitive and confidential information about the school, staff, pupils 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 staff's duty to report child protection concerns to the appropriate channel where staff believe a child is at risk of harm.

Sharing Concerns and Recording Incidents

All staff, including agency staff, volunteers and governors must be vigilant and share concerns and report incidents. Whistle blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The following 'Red Flag Behaviours' give indications of the kinds of situations which should be shared with a senior member of staff.

An adult who:
- allows a pupil/young person to be treated badly whilst pretending not to know it is happening
- gossips/shares information inappropriately
- demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- dresses in a way which is inappropriate for the job role
- does not treat pupils fairly - demonstrates favoritism
- demonstrates a lack of understanding about personal and professional boundaries
- uses his/her position of trust to intimidate, threaten, coerce or undermine
- appears to have an inappropriate social relationship with a pupil or pupils
- appears to have special or different relationships with a pupil or pupils
- seems to seek out unnecessary opportunities to be alone with a pupil.

Honesty and integrity
- Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using school property and facilities.

- Staff will not accept bribes. Gifts that are worth more than £20.00 must be declared and recorded on the gifts and hospitality register.

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

Dress code, Propriety, Behaviour, Reputation and Appearance
- All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general. An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting or bring the school into disrepute. Sharing negative comments about the school on social media is one such example.

- At the time of writing this policy, there are regularly updated legal requirements placed on members of the public in relation to Covid19 transmission. This includes, but is not limited to, laws relating to the size of social gatherings, the length of time people are

required to quarantine and the circumstances which require staff to isolate. Staff are required to adhere to these laws as they do all other laws as part of their legal duty to keep children and staff safe.

- Staff should also be aware that violence or sexual misconduct are considered criminal offences and behaviour that would bring the reputation of the school into disrepute.

- A person's dress and appearance are matters of personal choice and self-expression. However, all staff and volunteers must ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct. Staff will dress in a professional, appropriate manner. If it is possible to see '*up it - through it - or down it*' it will be considered inappropriate for the work environment. Clothes should not display any offensive or political slogans. All staff set the tone and expectations for the school. Children are expected to dress appropriately, and it is therefore important that we lead by example.

- At all times we should be professional and take pride in our school.

- Personal property of a sexually explicit nature such as books, magazines, DVDs or such material on any electronic media must not be brought onto or stored on the school premises.

- Social networking sites are extremely popular. Staff must not post material which damages the reputation of the school or which causes concern about their suitability to work with children and young people. Those who post material which could be considered inappropriate could render themselves vulnerable to criticism or allegations of misconduct.

Child Safeguarding Competences for staff and volunteers who work with Children and Young People

The following competences are necessary and means that all adults who work at Woolmore are expected to:
- have the ability to safeguard and promote the welfare of children and young people
- show a personal commitment to safeguarding children
- appreciate the significance of safeguarding and interprets this accurately for all individual children and young people whatever their life circumstances
- demonstrate an ability to contribute towards a safe environment
- be up to date with legislation and current events emotional awareness
- show awareness of the range of emotions in self and others
- demonstrate empathy for the concerns of others
- listen to and understand directly and indirectly expressed feelings
- encourage others to express themselves openly
- manage strong emotions and respond constructively to the source of problems
- listen to personal comments without becoming defensive
- in highly stressful situations, keep own feelings in check, take constructive action and calm others down
- have a range of mechanisms for dealing with stress, recognise when to use them and show respect for others' feelings, views and circumstances
- work within professional boundaries
- demonstrate professional curiosity
- accept responsibility and accountability for own work and can define the responsibilities of others
- recognise the limits of own authority within their role
- seek and use professional support appropriately
- understand the principle of confidentiality
- demonstrate high levels of self-awareness
- have a balanced understanding of self and others

- have a realistic knowledge of personal strengths and weaknesses
- demonstrate flexibility of approach
- show a realistic appreciation of the challenges of working with this client group / age of pupil
- demonstrate how s/he has promoted 'best practice'

Monitoring arrangements

This policy will be reviewed every year, but can be revised as needed in response to new legislation. It will be ratified by the full governing board.

Links with other policies

This policy links with our policies on:

- Behaviour Policy

- Whole School Covid-19 Risk Assessment

- Safeguarding and Child Protection Policy

- Staff Handbook

- Whistle Blowing Policy

- Online Safety Policy

- Staff disciplinary procedures, which will be used if staff breach this code of conduct and sets out examples of what we will deem as misconduct and gross misconduct

- Staff Procedures for Managing Allegations of Abuse against Staff Policy

- Intimate Care Policy

- RHE Policy

- https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/13ecce28-e8f2-49e9-83c6-c29337cd8071~110/original?tenant=vbu-digital

- https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf

Updated by

Hannah Williams, AHT Inclusion

Tracy Argent, Headteacher

September 2021

Policy	Staff Code of Conduct
Date	2021 - 2022
Review Date	September 2022

Low-Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:
• is inconsistent with [Insert name of the organisation] staff code of conduct, including inappropriate conduct outside of work, and
• does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO. You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

Details of concern

Name of staff member: Role:

Signed: Time and Date:

Received by: At: (Time)   On: (Date)

Action Taken: (Specify)

Signed: Time and Date:

This record will be held securely in accordance with Woolmore Primary School's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Woolmore Primary School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Example Timeline

Example timeline where multiple low-level concerns are shared regarding the same individual

| 2020 | | |

Concern or incident 1