



The Duke of York's Royal Military School

Staff Code of Conduct Policy

Date of Approval

06/02/2024

Approved By

Col Andy Thorne

Role

Chairman of Trustees

Signed

Last Reviewed	January 2024
Next Review	January 2025



Ministry
of Defence



bsa | BOARDING
SCHOOLS'
ASSOCIATION

Guston, Dover, Kent CT15 5EQ Tel: 01304 245023 e-mail: reception@doyrms.com www.doyrms.com

An Academy with charitable status Company registration No 07209122 VAT No 122448143 Registered Office: The Duke of York's Royal Military School, Guston, Dover CT15 5EQ

1 PURPOSE

1.1 The aim of this Code of Conduct for employees is to set out the standards of conduct expected of all staff and to provide further information for employees. This should be read in conjunction with our associated policies and the Teachers' Standards.

1.2 Employees should note that this Code is not exhaustive in defining acceptable and unacceptable standards of conduct and employees must use common sense in adhering to the underpinning principles. If any employee is unsure what the expectations are in any given circumstance, they should speak to their line manager or Principal.

1.3 This Code does not form part of any employee's contract of employment, and it may be amended at any time but should be seen as supplementing our employees' terms and conditions of service as laid out in their conditions of service.

1 SCOPE

1.1 The Code applies to all employees regardless of length of service including those in their probationary period. It also applies to agency workers and self-employed contractors although, unlike employees, breaches of the Code will not be managed through the disciplinary procedure.

1.2 As recognisable figures in the local community the behaviour and conduct of staff outside of work can impact on their employment. Conduct outside work may be treated as a disciplinary matter if it is considered that it is relevant to the employee's employment.

3 SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

3.1 All employees are responsible for safeguarding children and promoting their welfare. This means that employees are required to take action to protect children from maltreatment, prevent impairment of children's health or development and ensure that children grow up in circumstances consistent with the provision of safe and effective care. This will enable all children to have the best outcomes.

3.2 All employees must be aware of the signs of abuse and neglect and know what action to take if these are identified.

3.3 Employees must have fully read and understood our child protection, safeguarding and any other policies, be aware of our systems for keeping children safe and follow the guidance in these policies at all times.

3.4 All employees must cooperate with colleagues and with external agencies where necessary.

4 DUTY OF CARE

Staff must:

- understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached.
- always act, and be seen to act, in our students' best interests.
- avoid any conduct which would lead any reasonable person to question their motivation and/or intentions.
- take responsibility for their own actions and behaviour.

5 HEALTH AND SAFETY

All employees must ensure that they:

- read and understand the School's Health and Safety Policy.
- comply with health and safety regulations and use any safety equipment and protective clothing which is supplied to you by the School.
- comply with any hygiene requirements.
- comply with any accident reporting requirements.
- never act in a way which might cause risk or damage to any other members of the school community or visitors.
- inform their line manager of any paid work undertaken elsewhere. This is to comply with the Working Time Regulations, which are a health and safety initiative.

6 HONESTY AND PERSONAL INTEGRITY

6.1 Employees 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 at our School.

6.2 Employees maintain high standards of ethics and behaviour, within and outside school, by:

- treating students with dignity, building relationships rooted in mutual respect, and always observing proper boundaries appropriate to their professional position.
- having regard for the need to safeguard students' 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 being tolerant of those with different faiths and beliefs.
- ensuring that personal beliefs are not expressed in ways which exploit students' vulnerability or might lead them to break the law.

6.3 Employees must have proper and professional regard for the ethos, policies and practices of our School and maintain high standards in their own attendance and punctuality.

6.4 Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of School property and facilities.

7 TACKLING DISCRIMINATION

7.1 Employees are required to understand the types of discrimination and bullying that students and colleagues may be subject to. Employees are required to have read and understood our equality and anti-bullying policies.

7.2 Employees must not ignore any form of discrimination. This includes inappropriate jokes and 'banter'. Employees must positively promote equality and diversity and inclusion at all times.

8 PROFESSIONAL BOUNDARIES AND RELATIONSHIPS

8.1 Employees in our School are in a position of trust in relation to our students which means that the relationship between an employee and a student is not one of equals.

8.2 Employees must ensure that they avoid behaviour which might be misinterpreted by others. This includes any type of communication that they may have with students.

8.3 Employees must not make sexual remarks to any student or discuss their own sexual relationships with, or in the presence of, students. Employees must not discuss a student's sexual relationships in inappropriate settings or contexts. Any sexual behaviour by a member of staff towards any student is unacceptable and illegal.

8.4 Employees must ensure that professional boundaries are maintained at all times. This means that employees should not show favouritism to any student and should not allow students to engage in any type of behaviour that could be seen to be inappropriate. Students are not employees' friends and should not be treated as such.

8.5 Employees should be aware that it is not uncommon for students to become strongly attracted to a member of staff or to develop an infatuation. If any member of staff becomes aware of an infatuation, they should discuss it with School's Designated Safeguarding Lead immediately so that they can receive support on the most appropriate way to manage the situation.

8.6 For employees who are in a relationship with a colleague, parent or carer, or any other person associated with the school, we expect that they identify this to the Principal and ensure that this does not create a conflict of interest or affect their professional judgement or responsibilities in any way.

9 CONFIDENTIALITY AND PROTECTION OF DATA

9.1 Members of staff may have access to confidential information about students, colleagues or other matters relating to the School. This could include personal and sensitive data, for example information about a student's home life. Employees should never use this information to their own personal advantage, or to humiliate, intimidate or embarrass others. Employees should never disclose this information unless this is in the proper circumstances and with the proper authority.

9.2 If an employee is ever in doubt about what information can or can't be disclosed, they should speak to the School Designated Safeguarding Lead.

9.3 The School holds and processes data that is protected under the Data Protection Act 1998. Employees are expected to comply with the school's systems for collecting, storing, and using data. If any employee becomes aware that data is at risk of compromise or loss or has been compromised or lost, they must report it immediately to the Principal.

9.4 Employees must ensure that they have read and understood all our policies that relate to data including our IT policies.

10 PHYSICAL CONTACT WITH STUDENTS

10.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with students. Employees must ensure that they only do so in ways that are appropriate to their professional role and in response to the student's needs at the time. This should be of limited duration and appropriate to the age, stage of development, gender, and background of the student. Employees should always be able to explain why they have made physical contact with a student.

10.2 There may also be occasions where a student is in distress and needs comfort and reassurance which may include age-appropriate physical contact. If an employee is in this position, then they should consider the way in which they offer comfort, ensuring that it is not open to misinterpretation and is always reported to the School's Designated Safeguarding Lead.

10.3 Staff may legally physically intervene with students to prevent them from committing a crime, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Physical force should never be used as a form of punishment.

10.4 Sexual contact, including grooming patterns of behaviour, with students is unlawful and unacceptable in all circumstances.

11 SOCIAL CONTACT WITH STUDENTS

11.1 Employees should not establish or seek to establish social contact, via any channels (including social media), with students for the purposes of securing a friendship or to pursue or strengthen a relationship. Employees should use their work provided equipment only for communicating electronically with students. If there are any circumstances in which an employee has had to provide their personal contact details, including phone numbers, email address etc, to any student then they should report this to the Principal.

11.2 The school's advice to staff is not to connect to students via social media or other communication channels unless this is for professional purposes and that the employee can demonstrate that this is the case.

11.3 Our School is part of our community, and we recognise that, as members of the community, employees will encounter students outside of the school. We expect staff to use their professional judgement in such situations and to report to the Principal any contact that they have had with a student, outside of school, that they are concerned about or that could be misinterpreted by others.

12 WORKING ONE-TO-ONE WITH STUDENTS

12.1 There will be times where an employee is working one to one with a student and this is acceptable. Employees need to understand that this means that they may be more vulnerable to allegations being made against them. It is important, therefore, that employees:

- avoid meeting on a one-to-one basis in secluded areas of the School.
- ensure that the door to the room is open or that there is visual access into the room.
- inform a colleague or line manager of the meeting, preferably beforehand.
- reports to their line manager if the student becomes distressed or angry.

13 DRESS AND APPEARANCE

13.1 Employees are role models to our students and how they present themselves is important. Our expectation is that staff are decently, appropriately, and professionally dressed in work at all times. Staff are expected to wear 'conservative' business attire.

13.2 Staff in practical subjects may choose to wear clothing more suitable to the nature of their work or where appropriate, to wear protective clothing such as lab coats or overalls or, in the case of PE, tracksuits.,

13.3 For out of school activities, staff should dress appropriately for the activity. Generally, if students are required to wear school uniform, then so are staff.

14 GIFTS AND HOSPITALITY

For many of our employees there will be a limited opportunity to accept gifts and hospitality, but all staff must be aware that it is not acceptable for staff to accept bribes. Therefore, any gift, promotional offer or hospitality, intended either for the employee or for the School that exceeds a nominal value of £50 must be declared to the Principal and permission must be obtained before accepting. If an employee is ever unsure, then the best course of action is to politely decline the offer.

It is traditional for students and their parents or carers to give gifts as a small token of appreciation or as a thank you to members of staff at certain times throughout the academic year. This Code of Conduct is not designed to stop that practice. Staff may accept gifts from students and their parents or carers if they meet this definition. Any member of staff receiving a gift with a value of greater than £50 should inform the Principal who will then decide whether the gift can be accepted. Staff should make the Principal aware of any student who is giving them gifts on a regular basis, or any student or parent or carer who expects something in return for a gift, as this would not be acceptable. Staff should not give gifts to students unless this is part of a recognised practice in line with our behaviour policy.

15 KEEPING WITHIN THE LAW

15.1 Staff are expected to operate within the law. Unlawful or criminal behaviour, at work or outside work, may lead to disciplinary action, including dismissal, being taken. However, being investigated by the police, receiving a caution, or being charged will not automatically mean that an employee's employment is at risk.

15.2 Employees must ensure that they:

- uphold the law at work.
- never commit a crime away from work which could damage public confidence in them or the school or which makes them unsuitable for their work. This includes, for example:
 - submitting false or fraudulent claims to public bodies (for example, income support, housing, or other benefit claims).
 - breaching copyright on computer software or published documents.
 - sexual offences which will render them unfit to work with children or vulnerable adults.
 - crimes of dishonesty which render them unfit to hold a position of trust.
- Write and tell the Principal (or Chair of Trustees if they are the Principal) immediately if they are questioned by the police, charged with, or convicted of, any crime while they are employed at the school (this includes outside of their working hours). The Principal/Trustees will then need to consider whether this charge or conviction damages public confidence in the school or makes the employee unsuitable to carry out their duties.

16 CONDUCT OUTSIDE OF WORK AND WORK RELATED FUNCTIONS

16.1 Unlike some other forms of employment, working at our school means that an employee's conduct outside of work could have an impact on their role.

16.2 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school or the employee's own reputation or the reputation of other members of the school community. Employees should be aware that any conduct that we become aware of that could impact on their role within the school or affect the School's reputation will be addressed under our disciplinary procedure.

16.3 We, therefore, expect employees to make us aware immediately of any such situations that have happened outside of the School.

16.4 Employees are required to demonstrate responsible behaviour at work-related functions and work-related social events that take place outside normal work hours and to act in a way that will not have a detrimental effect on our reputation.

17. ALCOHOL/DRUGS

17.1 All School employees should ensure that they report fit for work and remain fit to perform their duties. The consumption of alcohol is not permitted on school premises unless specifically approved by the Principal and never during school session times. The School prohibits the use, possession, distribution or sale of drugs at the workplace, or when conducting school business.

17.2 Where it is established that there is an alcohol or drug dependency problem, this will be considered as a treatable illness and the Principal will provide assistance wherever possible. The Employee Assistant Programme currently run by Health Assured is also available to provide counselling and advice. Where employee refuses help or drops out of a treatment programme this will not be automatic grounds for dismissal, however, any unacceptable behaviour or level of performance thereafter will be subject to appropriate action.

18. ADDITIONAL EMPLOYMENT

18.1 The School will not prevent an employee from undertaking additional employment providing it does not conflict with the interests of, or in any way weaken public confidence in the school and does not in any way affect performance of their duties and responsibilities while he/she is at work. Employees have a duty to take reasonable care of their own health and safety. Staff in the school *must* inform the Principal/HR Manager if they take up additional hours which mean that their total number of hours worked exceed an average of 48 hours per week, or which could have a detrimental effect on their health and safety. Employees are required to obtain consent from the Principal if they wish to take up any additional employment.

18.2 A related issue concerns payment received by employees for work which arises principally because of work-related skills and is carried out for private purposes during working hours (by prior agreement), or annual or special leave and during periods of school closure, or when using school information, equipment, or facilities. Examples might be when an employee writes a book using information belonging to the school, an employee who marks examination papers during annual leave periods or an employee who produces computer software which is capable of being marketed outside the school for profit. The question then arises of who should retain payments for such work (i.e., the School, the employee or a split between the school and the employee). Should an instance of this nature arise employees should consult the Principal who will decide regarding the acceptability of the project and, if applicable, how resultant payments will be handled, prior to commencement of any such work. It may be necessary for the Principal to take advice from the HR Manager.

19. PROMOTIONAL SALES/BENEFITS

19.1 Offers from companies of promotional sales should be declined. Employees should bring such matters to the attention of the Bursar in order that a decision can be made as to whether it is appropriate to inform the finance team who can write to the company concerned, indicating that improved discounts are the only form of promotion acceptable to the School.

19.2 The use of personal loyalty cards while making purchases on behalf of the School is also unacceptable. It may bring into question the impartiality of the use of that supplier.

20. SPONSORSHIP

20.1 Where an external organisation wishes to sponsor or is seeking to sponsor a School activity, whether by invitation, tender negotiation or voluntarily, the conventions concerning acceptance of gifts or hospitality apply. Care must be taken when dealing with contractors or potential contractors.

20.2 From time to time if a local authority or a business sponsor or gives grants for sporting and cultural events such as exhibitions, plays or performances or games. The general rule is that no employee nor any partner, spouse or relative associated with the School shall receive any benefit from such sponsorship or grant in a direct way without there being full disclosure to the head.

21. APPOINTMENT OF STAFF

21.1 An employee must not be involved in the appointment or any other decision relating to the discipline, promotion, pay or conditions of another employee, or prospective employee, who is a relative or friend.

21.2 'Relative' means a spouse, partner, parent, parent-in-law, son, daughter, stepson, stepdaughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse or partner of any of the preceding persons. 'Partner' in sub paragraph (1) above means a member of a couple who live together.

21.3 Employees involved in appointments should ensure that those appointments are made only based on merit. To avoid any possible accusation of bias, employees should not be involved in an appointment (which includes involvement in any part of the selection process) where they are related to an applicant or have a personal relationship with him or her outside of work.

21.4 Similarly, employees should not be involved in decisions relating to discipline, promotion, recruitment or pay and conditions for any other employee who is a relative, partner, etc. Employees must declare a personal relationship and if it is thought that a potential conflict of interest arises, arrangements should be made to re-organise the work of both parties.

22 REVIEW

This Code of Conduct is reviewed and amended annually by the School. We will monitor the application and outcomes of this code of conduct to ensure it is working effectively.


PREAMBLE

Teachers make the education of their pupils their first concern, and are accountable for achieving the highest possible standards in work and conduct. Teachers act with honesty and integrity; have strong subject knowledge, keep their knowledge and skills as teachers up-to-date and are self-critical; forge positive professional relationships; and work with parents in the best interests of their pupils.

PART ONE: TEACHING

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 reading, demonstrate a clear understanding of systematic synthetic phonics
- 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 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
- 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, 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 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
- 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 well-being.

PART TWO: PERSONAL AND PROFESSIONAL CONDUCT

A teacher is 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 teacher's career.

- Teachers 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
 - 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.

LOW LEVEL CONCERNS

Rationale

This policy should be read in conjunction with The Duke of York's Royal Military School Safeguarding and Child Protection, Staff Code of Conduct and Whistleblowing Policies, and has been created to empower staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

The purpose of the policy is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour, set out in the school's Staff Code of Conduct and other related policies, 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 that 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.

This policy seeks to:

- Ensure that staff are clear about, and confident enough, 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 Principal.
- 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 organisation's safeguarding system.
- To assure staff that this is to support them in relation to safeguarding themselves and professionalism.

Keeping Children Safe in Education September 2023

The following is taken from Keeping Children Safe in Education September 2023:

424. *As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.*
425. *Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:*
- *enable schools and colleges to identify inappropriate, problematic, or concerning behaviour early.*
 - *minimise the risk of abuse.*
 - *ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.*

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 and Child Protection Policy.

Concerns that **do** meet the threshold can include 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.
- 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.
- 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).

Further information regarding responses and actions to behaviours that may meet the harm threshold are contained within the school's Safeguarding and Child Protection (Section 8.2), Staff Code of Conduct and Managing Allegations of Abuse Against Teachers and Other Staff policies. Concerns of this nature should be reported to the Principal 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., a person *believes* 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 policy, 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; or,
- 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.

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 Principal. **This should be done without delay.**

Where there are concerns/allegations about the Principal, these should be referred to the Chair of Trustees (whose contact details can be obtained from the Clerk to Trustees).

Self-referral

This is to ensure that a member of staff can also, without prejudice, report concerns that have happened to them.

This may include but not limited to: -

- Students trying to befriend them on social media.
- Students or parents sending inappropriate emails.
- Students contacting them via an electronic device in an inappropriate manner inclusive of images.
- Students or parents making unwanted advances.

This is designed so that staff ensure they are feeling supported and secure to do the right thing. Self-reporting is designed to ensure that the Principal and DSL can have strength to protect the staff at the school against fictitious claims.

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 in contrary to the School's Staff Code of Conduct and expectations, should self-refer to the Principal.

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.

Dealing with Low-Level Concerns

All low-level concerns are shared using the safe staff reporting mechanism via CPOMs. However, a conversation with the Principal may be prudent in the first instance. Details must then be recorded using the CPOMs reporting tool.

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 reasonably possible.

Where the low-level concern is provided verbally, the Principal should make an appropriate record of the conversation, either at the time, or immediately following the discussion, paying heed to the details above. Records must be signed, timed, and dated.

Records will remain confidential in accordance with the school's Data Protection and GDPR policies.

Responding to a Low-Level Concern

The Principal will in the first instance satisfy himself that it is a low-level concern and does not need to be reclassified as a higher-level concern/allegation and can be dealt with under appropriate procedures.

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

- The threshold is met for a higher-level concern/allegation.
- There is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- There is other information which when considered leads to a higher-level concern/allegation.

Where the Principal 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 Principal 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 Principal 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 the Principal to categorise the type of behaviour and determine what further action may need to be taken. All of this is to be recorded, along with the rationale for the 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.

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 Principal and DSL 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 regular 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:

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

Further Clarity around Allegation vs. Low-Level Concern vs. Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children 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 they may pose a risk of harm to children.

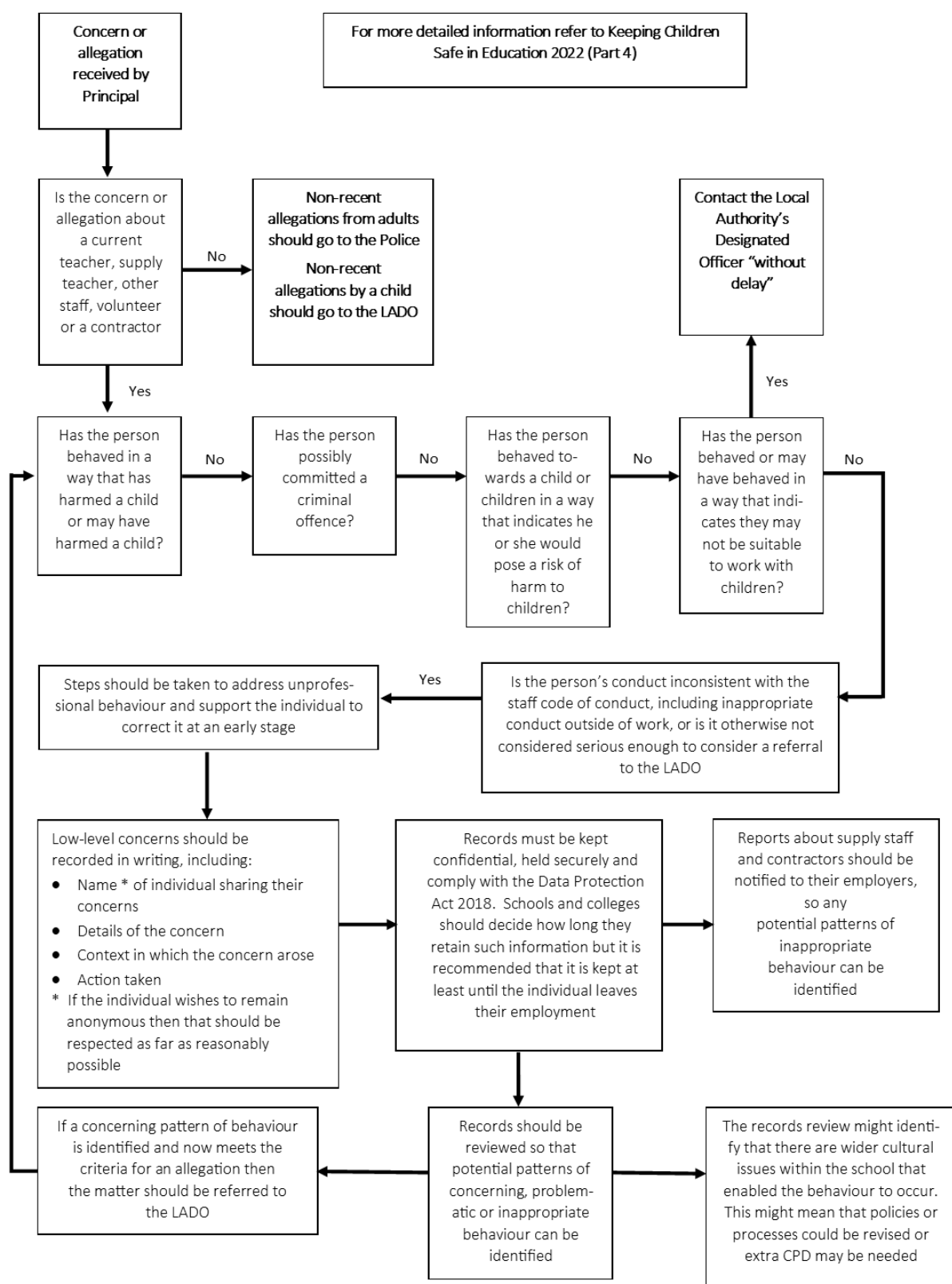
Low-Level Concern

Any concern, no matter how small, even if no more than a 'nagging doubt' that an adult has acted in a manner which:

- Is not consistent with the school's Staff Code of Conduct; and/or
- Relates to their conduct outside of work that, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

- Behaviour which is entirely consistent with the school's Staff Code of Conduct, and the law.



What is a low level concern?

The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the threshold set out in KCSIE 2022. 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 - 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