



**St. MICHAEL'S**  
CE (CONTROLLED) INFANT SCHOOL

# **St. Michael's CE Infant School - Staff Code of Conduct including Low Level Concerns Policy**

Reviewed July 2023  
To Be Reviewed by July 2024

## St. Michael's CE Infant School - Staff Code of Conduct

*'St. Michael's CE (Cont) Infant School aims to provide a caring Christian Community where everyone is valued and nurtured within a safe environment. All our policies take account of and reflect the distinctive nature of our Church of England School.'*

### 1. Purpose and principles

This Code of Conduct aims to establish a set of principles which underpin the expected conduct of staff at St. Michael's CE Infant School with the intention of encouraging staff to achieve the highest standards of conduct at work and of minimising the risk of improper conduct occurring. The school requires that all staff have read and comply with the Code of Conduct. Where clarification is needed on any aspect of this document, this should be sought from the Headteacher. Breach or failure to observe the provisions of this document may lead to action being taken under the Staff Disciplinary and Grievance Policy and Procedures. This can be found on the school website under 'Information for parents' = 'Policies'. The Code of Conduct is not exhaustive in defining acceptable and unacceptable standards of conduct and behaviour and in circumstances where guidance does not exist individuals are expected to use their professional judgement and act in the best interests of the school and its pupils.

### 2. Scope

The Code of Conduct applies to:

- all members of staff, including teaching and support staff;
- volunteers, including governors;
- casual workers;
- temporary and supply staff, either from agencies or engaged directly;
- student placements, including those undertaking initial teacher training, and apprentices.

References to 'staff' throughout the Code of Conduct refer to all of the above groups. Any links within this document to other documents are for ease of use and do not form part of this Code of Conduct.

The Code of Conduct exists in addition to Hampshire County Council's [Local Government Code of Conduct](#)

### 3. Professional standards at work

Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. The school expects staff to treat each other, pupils, parents and the wider school community with dignity and respect at all times, and to be punctual and have excellent attendance unless this is unavoidable. Furthermore, staff must have regard for the ethos and values of the school as well as its policies and procedures and act in accordance with these at all times, including in their dealings with those who come into contact with the school e.g. visitors. Staff must act in accordance with their duty of care to pupils and ensure that the safety and welfare of the children and young people at the school are accorded the highest priority.

In this and other ways staff should always maintain standards of conduct and behaviour which sustain their professional standing and that of the school. Teachers are reminded of, and are expected to uphold, their wider responsibilities as set out in the [Teachers' Standards](#) including an understanding of, and acting within, the statutory frameworks which set out their professional duties and responsibilities.

#### **4. Safeguarding**

St. Michael's CE Infant School recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities. Staff must be aware of their individual safeguarding responsibilities, including to provide a safe environment in which children can learn, to be aware of the signs of abuse and neglect, to identify children who are suffering, or are likely to suffer, significant harm and to take appropriate action in such cases to prevent concerns from escalating. All members of staff must be aware of the school's systems for supporting child safeguarding, including the role of the school's Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs). In this school, the DSL is the Headteacher. DDSLs are Miriam Thorley and Rebecca Carey (SENDco).

Staff have a professional duty to report concerns about the welfare of a child. Any such concerns must be raised without delay to the school's DSL in the first instance or to the DDSLs if the DSL cannot be located. In the event that none of the above are available any member of staff should contact Hampshire County Council's Safeguarding team on 01962 876364. There should be no delay in reporting a concern if there is risk of immediate serious harm to a child. Staff are reminded of their duty to report safeguarding concerns about staff. Any concerns or allegations must be raised without delay to the school's DSL in the first instance or to the DDSLs if the DSL cannot be located.

Staff should be familiar with the school's child protection policy, which is available to everybody on the school website under 'Information for parents' = 'Policies'. All staff will receive appropriate child protection training and will be provided with guidance on child safeguarding as part of their induction to the school. In accordance with the statutory guidance published by the Department for Education 'Keeping Children Safe in Education' all staff in St. Michael's CE Infant School are required to read Part One 'Safeguarding information for all staff' and will be provided with a copy as part of their induction to the school. The full document can be found on the website under 'Information for parents' = 'Policies'. Teachers, Learning Support Assistants and Office Staff will be provided with a school email address. They must check for emails concerning school matters and including CPOMS alerts at least once every weekday during term time so that they have relevant knowledge about concerns relating to children.

#### **5. Appropriate relationships**

##### **Pupils**

Individuals who work or volunteer in a school environment are in a position of trust. Staff should be mindful of the need to maintain professional boundaries appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised. Staff must avoid unnecessary physical contact with children. Where physical contact is essential, e.g. for safety reasons, the pupil's permission must be gained for that contact wherever possible. If physical contact is made to remove a pupil from a dangerous situation or an object from a

pupil to prevent either harm to themselves or others, then this should be recorded and reported to the Headteacher. In cases where accidental physical contact was made, it should also be reported to the Headteacher. In all cases staff should act in accordance with the school's physical restraint policy, a copy of which is handed out at induction and e-mailed to all staff as an annual reminder. It is also available on the school website under 'Information in Parents' = 'Policies'

Any sexual behaviour by a member of staff with or towards a pupil is unacceptable. Staff are reminded that under the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18, where that person is in a position of trust in respect of that child, even if the relationship is consensual.

## **Parents**

Staff are expected to interact with parents in a polite and respectful manner and recognise parents' entitlement to express any concerns they may have about their child's learning, safety or wellbeing. Staff should avoid discussing school matters with parents outside school if approached and should instead refer the parent to the normal school communication channels.

## **6. Use of social media and mobile phones**

Social networking sites offer the opportunity for communication with children, young people and their parents outside normal professional boundaries. School staff must take care to protect their privacy and protect themselves from risk of allegations in relation to inappropriate relationships and cyberbullying. Staff must not have any unauthorised contact or accept 'friend' requests through social media with any pupil unless they are family members. Staff must exercise caution when having contact online through social media with parents so as not to compromise the school's reputation or school information.

Mobile devices should not be used for any reason (for example making and receiving calls, texting or checking social media or the internet), whilst members of staff are with children, other than in an emergency.

## **7. Confidentiality and disclosure of information**

Staff must ensure that they do not disclose confidential information to anyone who does not have the right to receive it. Where information is disclosed this should be in line with the principles of the Data Protection Act 2018. Equally staff should not prevent another person from gaining access to information to which that person is entitled by law. If there is doubt about whether or not to share information, advice must be sought from an appropriate senior member of staff. Information obtained during the course of an individual's work should never be used for personal gain or benefit, nor should it be passed onto others who might use it in such a way.

## **8. Dress and appearance**

An individual's dress and appearance is a matter of personal choice; however, staff should ensure that they dress appropriately, decently and safely for a school environment and for the role they undertake, as well as setting a good example to both pupils and visitors. Staff should have particular regard to the health and safety risks involved with certain lessons i.e. physical education/food technology and the need to dress appropriately and safely when undertaking these activities, such as wearing appropriate footwear, removing jewellery etc. The school recognises the diversity of cultures

and religions of its staff and will take a sensitive approach when this affects dress and uniform requirements. However, priority will be given to health and safety, security and other similar considerations of other staff, pupils and the school.

#### **9. Equal opportunities**

The Governing Body of the school is committed to equality for all in the appointment, development, training and promotion of staff, and in all dealings with pupils and parents of the school. It also recognises that all members of staff have the right to work in a safe environment without fear of discrimination, harassment or abuse. All pupils, colleagues, parents, members of the public and wider school community have the right to be treated with fairness and equality and must not be discriminated against. The school expects staff to uphold these principles. A copy of our Single Equality policy is held on the school website under 'Information for parents' = 'Policies'

#### **10. Conduct outside work**

Care should be taken by staff to avoid any conflict of interest between activities undertaken outside school and responsibilities within school. In no case should outside activities bring the school into disrepute. Staff must disclose any misconduct or alleged misconduct made against them, including any incidents arising from alternative or additional employment outside of this school. Disclosure must be made to the Headteacher without delay, after which consideration will be given to the relevance or otherwise of the misconduct to their role in the school.

#### **11. Declaration of interests**

Staff should consider carefully whether they need to declare to the school any relationship with an individual where this might cause a conflict with the school's activities, for example, a relationship with a Governor, another staff member or a contractor who provides services to the school. Where such a declaration is necessary this should be made to the Headteacher. Staff may undertake work outside school, either paid or voluntary, provided it does not conflict with the interests of the school nor be at a level which may contravene the [Working Time Regulations](#) or affect an individual's performance at work.

#### **12. Whistleblowing**

The [Public Interest Disclosure Act 1998](#) (as amended) gives protection to people who disclose reasonable concerns about serious misconduct or malpractice at work. This is sometimes known as Whistleblowing. The Governing Body of the school will treat all matters of malpractice very seriously and allegations about such matters will be dealt with quickly and with appropriate confidentiality. Staff should acknowledge their individual responsibilities in bringing matters of concern to the attention of senior leadership in the school. This is particularly important where the welfare of children may be at risk. A clear procedure is provided for staff to raise issues with the purpose of assisting in reducing the risk of serious concerns being mishandled, whether by the individual or by the school. Please refer to the school's Procedure for Protected Disclosures ("Whistleblowing") for further information, which can be found on the school website under 'Information for parents' = 'Policies'. A copy is handed out on induction and is e-mailed to all staff on an annual basis as a reminder..

#### **13. Health and safety**

Staff must adhere to the school's Health and Safety policy and should ensure that they take every action to keep themselves and others in the school environment safe. Please refer to the school's Health and Safety policy which can be found on the school website under 'Information for parents' = 'Policies' and which is given to staff on induction, for further information. There are also copies on the Health and Safety noticeboard in the stock room and on the noticeboard in the staff room.

#### **14. Gifts and hospitality**

There may be occasions where children or parents wish to pass small tokens of appreciation to staff, for example as an end of year 'thank-you', and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value or to suggest to pupils that gifts would be appropriate or desired. Money should never be accepted as a gift. It is not acceptable for staff to give gifts to pupils other than small gifts which may be given to every child in the class at Christmas or the end of the school year, in consultation with the year leader or Headteacher. Any rewards given to children must be given in agreement with the reward practice of the school.

Staff should not solicit or accept any gift, hospitality or other reward from external parties which influences the way in which they carry out their duties or leads the giver to expect preferential treatment.

#### **15. Use of school resources and funds**

The use of school resources, property and equipment is for school-related activities only, except where otherwise agreed. All members of staff must use any public or school funds entrusted or handled by them in a responsible and lawful manner.

#### **16. Further Information**

Reference to the school website – the address is [www.st-michaels-inf.hants.sch.uk](http://www.st-michaels-inf.hants.sch.uk)

If any further information is required please enquire, in the first instance, at the school office.

# Low Level Concerns Policy



**St. MICHAEL'S**  
CE (CONTROLLED) INFANT SCHOOL

Reviewed September 2023  
To Be Reviewed by end of September 2024

## **1.0 Policy statement**

1.1 Our school recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

1.2 Our school works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

## **2.0 Scope**

2.1 All employees employed at this school including:

- Teachers
- Support staff
- Supply teachers
- Volunteers
- Local Authority visiting staff
- Contractors

## **3.0 Policy aims**

3.1 To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.

3.2 To enable schools to identify concerning, problematic or inappropriate behaviour early.

3.3 To minimise the risk of abuse occurring.

3.4 To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school

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

## **4.0 Definition**

4.1 The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.



- 4.2 'Keeping Children Safe in Education' defines a low level concern as: "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 or college 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"

## **5.0 Avoiding low level concerning behaviour**

5.1 Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

5.2 Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

5.3 Our school ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

- Staff Code of Conduct
- 'Avoiding Allegations' guidance
- Safeguarding and Child Protection policies and regular training
- Teachers' Standards (for teaching staff)

## **6.0 Reporting a low level concern**

6.1 Low level concerns about a member of staff should be reported to the DSL and/or Headteacher as per the school's Child Protection procedures. If the concern is about the Headteacher this should be reported to the Chair of Governors.

6.2 Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

## **7.0 Dealing with a low level concern**

7.1 Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Headteacher.

7.2 The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.

7.3 The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

## 8.0 Recording a low level concern

8.1 All low level concerns should be formally recorded by a member of staff when they are made aware of them. This record should then be passed to the Headteacher (or Chair of Governors if the concern is about the Headteacher).

8.2 The record should include:

- Details of the concern,
- The context in which the concern arose,
- The outcome of the investigation and any action taken, and
- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

8.3 Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low- level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles and should be retained on the employee's personnel file in accordance with the school retention schedule. Please refer to the Headteacher to obtain a copy of your School's retention schedule if required.

## 9.0 Reviewing a low level concern

9.1 Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

9.2 Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

9.3 The school will take advice, where appropriate, from their HR provider in respect of low level concerns.

9.4 The school will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

9.5 Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles and should be retained on the employee's personnel file in accordance with the school retention schedule. Please refer to the Headteacher to obtain a copy of your School's retention schedule if required.

9.6 Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance). Low level concerns which relate solely to safeguarding will not be included in a reference, subject to paragraph 9.7.

9.7 A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

## 10.0 Related guidance

10.1 The policy links to the following guidance documents:

- Keeping Children Safe in Education (DfE)
- Model Code of Conduct (Manual of Personnel Practice)
- Avoiding Allegation guidance (Manual of Personnel Practice)
- Safeguarding Policy (Safeguarding Unit) ▪ Child Protection Policy (Safeguarding Unit)

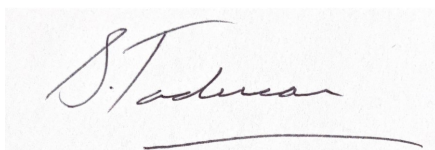
Policy Agreed on: Sept 2023

Review by: Sept 2024

Updated with addition of the Low Level Concerns Policy

**Signed by:**

**Chair of Governors, Sue Tadman**

A rectangular box containing a handwritten signature in black ink that reads "S. Tadman".

**Headteacher:**

A handwritten signature in black ink, appearing to read "D. Brown".

**Agreed by Governors: July 2023**

**Review Date: July 2024**