

# Staff Code of Conduct

Schools and Academies

September 2026

Lydden and River Schools Federation

For the School / Academy to complete:

|                                                       |
|-------------------------------------------------------|
| Consultation Date with Employees / Recognised Unions: |
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#### **Guidance Note:**

This policy has been developed by HR Connect for use in all Schools and Academies.

#### **Kent Schools**

The Local Authority expects that all KCC Community and Voluntary Controlled Schools will use this document as the basis for their Code of Conduct. This document is also strongly recommended for consideration for adoption by Foundation and Aided Schools.

This document has been shared with representatives of KCC's recognised trade union / professional associations for comment. Schools are advised to ensure staff and unions have the opportunity to comment on the proposed code of conduct prior to the document being formally adopted by Governors.

#### **Academies and Schools Outside of Kent**

This policy and procedure may be adopted in its entirety or adapted for use by Academies and Schools / Academies outside of Kent.

Statutory / contractual obligations are highlighted within the policy. Areas where the Academy may determine their own approach or adopt varied provisions are also indicated.

HR Connect is able to advise and support Academies in developing their own policies.

Academies are strongly advised to ensure that there is sufficient opportunity for staff and their trade union / professional representatives to comment on the proposed code of conduct prior to the document formally being adopted by Governors. This is particularly important where Employees who are subject to TUPE transfer into the organisation.

The document also contains references to other policies which the school may want to signpost employees to refer to in conjunction with this policy.

It is recognised that schools may have locally adopted policies / practices or a staff handbook - therefore schools should amend this template code of conduct to ensure that any references to expectations made within this document are consistent with the existing policies they may have and that any duplication is minimised. This may include deleting certain paragraphs and signposting Employees to separate documents where this is more appropriate.

It is recommended that the School / Academy undertakes an Equality Impact Assessment on all policies for the management of staffing issues.

Please ensure you populate the highlighted sections and remove any non applicable options and also the guidance notes before adopting this policy and procedure.

Please note that this document uses 'School' to denote reference to Schools and Academies.

## Version Control

| Date           | Revisions                                                                                                                    |
|----------------|------------------------------------------------------------------------------------------------------------------------------|
| September 2024 | 5,6, 9,12,15,23,24 (updated link),35,36<br><br>New Appendix 6 - Policy for the Management of Low Level Safeguarding Concerns |

## Part A: Policy

### 1 Policy Statement

The School expects the highest standards of personal and professional conduct from all Employees.

As such the School requires all Employees to act in a manner which reflects the value and ethos of the School.

Employees must ensure that their behaviour and actions are consistent with their position as a role model to pupils / students and are compatible with working with young people and in a School setting.

Employees must act with integrity, honesty and demonstrate ethical and respectful working practices towards pupils / students, colleagues, parents/ carers and other members of the School community.

All Employees have a responsibility to observe appropriate professional boundaries and act at all times in a manner which safeguards and promotes the welfare of pupils / students.

All staff must read Part One of Keeping Children Safe in Education 2026 in full and follow the School's safeguarding policies and procedures. From 1 September 2026, all staff are subject to the same Part One safeguarding expectations; the previous shorter Annex A is no longer used.

Employees must disclose any relevant information which may impact on their job role or suitability to work with young people or in a School setting.

The School requires Employees to adhere to all School policies and observe the highest standards of business / financial practice.

Each Employee has an individual responsibility to act in a manner which upholds the School's in providing effective and professional education to pupils and protects its reputation to do the same with confidence in the local community.

Employees are accountable for their actions and conduct and should seek advice from their Line Manager / Headteacher if they are not sure of the appropriate action to take.

Employees should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action being considered. A serious breach could potentially result in dismissal.

This policy explains the School's expectations with regards to the conduct of Employees in the following areas:

- Professional conduct
- Safeguarding Pupils / Students
- Use of ICT & Social Media
- Business conduct

## **2 Scope**

This Policy applies to all current Employees of Lydden and River Schools.

This Policy should also be adhered to by all other adults working in and on behalf of the school including volunteers / supply and agency workers engaged by the School. It does not include Governors for whom separate arrangements apply.

Reference to the management role of the headteacher in this policy, this may include their identified nominee. In the case of the headteacher this management function is undertaken by the Chair of Governors.

This policy should be read in conjunction with the School's Discipline and Conduct Policy which provides examples of acts which are likely to be regarded as misconduct.

## **3 Adoption Arrangements and Date**

This policy was adopted by the Governing Body of Lydden and River Schools Federation in September 2026 and supersedes any previous Code of Conduct

This policy will be reviewed by the Governing Body each year or earlier if there is a need. This will involve consultation with the recognised unions.

## 4 Responsibilities of the School

- Explain the provisions of the Code of Conduct to Employees and signpost Employees to other relevant policies, document and guidelines
- Provide additional advice and guidance to Employees in relation to queries they may have regarding the application of the Code of Conduct
- Coach, support and provide feedback to Employees on their performance in relation to the required standards of conduct
- Take appropriate action at the earliest opportunity to address breaches of the expected standards of conduct

## 5 Responsibilities of the Employee

*Employees are required to sign the declaration at Appendix 1 to confirm that they have read and will comply with the Code of Conduct.*

- To read, understand and comply with the Code of Conduct at all times
- To use this code, alongside other relevant School policies and professional codes, to guide them in their role
- To seek guidance from the Headteacher / Line Manager (or Chair of Governors in the case of the Headteacher) if they are unclear about the conduct or actions expected of them
- To alert the Headteacher (or Chair of Governors in the case of the Headteacher) at the earliest opportunity where an Employee believes they may have acted in a manner which is inconsistent with the Code of Conduct and other relevant School Policies and professional codes.
- To alert the Headteacher (or Chair of Governors in the case of the Headteacher) / Designated Safeguarding Lead where they believe they or another employee or adult working in or on behalf of the school has acted in a manner which has the potential to constitute any safeguarding concern, including those that may be regarded as 'low level concerns'.

## 6 Reference to Other Sources of Information

This Code of Conduct is not exhaustive and does not replace the general requirements of the law, common sense and good conduct.

The Code of Conduct should be read in conjunction with a number of associated policies relating to conduct which are set out in Appendix 2 of this document.

In addition to this policy, all staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the provisions of the STPCD, the latest 'Teachers' Standards 2012' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

Part 2 of the Teachers' Standards is available at Appendix 3 and can also be access online via:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/665522/Teachers\\_standard\\_information.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/665522/Teachers_standard_information.pdf)

All Employees must ensure they have read, understood and comply with the following sections of the current edition of Keeping Children Safe in Education (KCSIE)

- Part 1 - Safeguarding Information for all staff
- Part 4 Section 2 Concerns that do not meet the harm threshold

Further guidance regarding Safeguarding is in Part C of this document.

Staff must also have due regard to other professional codes, policies and guidance which may be relevant to their specific role.

## **Part B: Professional Conduct**

### **7 General**

Employees are expected to demonstrate consistently high standards of personal and professional conduct.

Employees are required to work in a diligent and conscientious manner.

Employees are expected to work to the requirements of their job and are required to respect managerial authority and follow reasonable instructions.

Employees must conduct themselves in a manner which reflects the ethos and values (Christian values if a church school) of the School and adhere to School policies and procedures at all times.

Employees should ensure they work their contracted hours and are expected to maintain a high level of attendance and punctuality.

### **8 Honesty and Integrity**

Employees must maintain high standards of honesty and integrity in their work.

Employees should not behave in a manner which would lead a reasonable person to call into question their motivation or intentions.

During the course of their work Employees should ensure they do not:

- Willfully provide false / misleading information
- Destroy or alter information / records without proper authorisation
- Willfully withhold information or conceal matters which they could reasonably be expected to have disclosed
- Misrepresent the School or their position
- Accept or offer any form of bribe / inducement or engage in any other corrupt working practice

Should an Employee become aware of any conduct on the part of a colleague which raises concerns regarding health and safety, safeguarding or criminal activity - they have a duty to disclose this.

Allegations concerning fraudulent, dishonest or corrupt practices or the falsification or withholding of information will be investigated under the School's Disciplinary Policy and formal disciplinary action taken where appropriate.

## 9 Setting an Example

School Employees are role models and must strive to adhere to behaviour that sets a good example to all the pupils/students within the School and is appropriate in a School setting.

This includes:

- Refraining from abusive or potentially offensive / discriminatory language or actions. (The use of profanity, vulgar expressions, personal insults, violence, harassment for example, will be considered unacceptable)
- Being mindful and sensitive to the customs, practices, culture and personal belief of others.
- Positively contributing to the creation of a fair and inclusive work environment where everyone can thrive and do their best work.
- Demonstrating tolerance and respects towards others by being mindful and sensitive to the customs, practices, culture and personal belief of others.
- Contributing to the creation of a fair and inclusive School environment where everyone can thrive and do their best work.
- Observing boundaries appropriate to their role and a School setting
- Ensuring any topics of conversation with pupils/students are suitable to the School setting / curriculum
- Not undermining fundamental British values\*
- Ensuring personal / political opinions or beliefs do not impact on the discharge of duties and/or are not expressed in a way which exploits pupils' / students' vulnerability or seeks to unduly influence.
- Maintaining high standards of personal presentation, attendance and punctuality

Should Employees be in doubt about the appropriateness of their behaviour they should seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher). Breaches of expected behaviour may be considered under the disciplinary procedure and may result in formal disciplinary action including dismissal.

*\*as defined in KCSIE and the Government's Prevent Strategy as democracy, rule of law, individual liberty and mutual respect*

## 10 Confidentiality

Employees may have access to confidential or sensitive information about pupils /students, colleagues or the business and operation of the School as part of their job role.

Such information must not be disclosed to any person who is not entitled to have access to this or legitimately needs it for work purposes.

Specifically, all Employees must:

- Work in accordance with the requirements of the General Data Protection Regulation (2018) and associated legislation
- Observe the School's procedures for the release of information to other agencies and members of the public
- Not use or share confidential information inappropriately or for personal gain
- Not speak inappropriately about the school community, pupils, parents, staff or governors including discussing incidents, operational or employment matters with parents / members of the public
- Ensure all confidential data is kept secure and password protected

Should Employees be in doubt about the appropriateness of sharing information they should seek guidance from the Headteacher.

*Please also refer to the School's Data Protection / Information Governance Policies*

Employees must model respectful relationships and must not use, tolerate or dismiss sexist, misogynistic, degrading, discriminatory or sexually inappropriate language or behaviour as 'banter'. Staff should challenge and report such behaviour in accordance with School procedures.

## **11 Working Relationships & Relationships with other Stakeholders / Community**

The School expects Employees to maintain positive and professional working relationships. Colleagues, pupils, parents and other stakeholders\* should be treated with dignity and respect.

Employees should be polite and courteous in their interactions with parents / pupils and other stakeholders / members of the School community.

Behaviour which constitutes bullying and harassment, intimidation, victimisation, discrimination or abuse of authority will not be tolerated and may be addressed via the School's bullying and harassment and / or disciplinary policy. This includes physical and verbal abuse and use of inappropriate language (for example the use of profanities or vulgar expressions) or unprofessional behaviour (for example being rude or hostile) with colleagues, pupils and parents.

Employees should treat all stakeholders in a fair and equitable way and not behave in a manner which may demean, distress, offend or discriminate against others.

Employees should ensure that policies relating to equality issues are complied with.

Employees should be aware of the School's Complaint Procedure and address any concerns from parents / pupils and other stakeholders in accordance with this document.

*\* Other stakeholders may include, but are not limited to, members of the governing body, representatives of the diocese (where relevant), local authority members and officers, visitors to the school site, contractors, suppliers, service providers and other members of the wider community with an involvement in or connection to the operation of the School.*

*Please also refer to the School's Complaints Procedure*

## 12 Conduct Outside of the Workplace

The School recognises that Employees are entitled to their private lives. In general, the choices and actions of employees outside of their job role are not the School's concern. However, in order to protect all parties, there are exceptions to this.

All Employees working in the School Community must be mindful that they have a responsibility to maintain public confidence in their own and the School's ability to safeguard the welfare and best interests of children and young people. It is therefore, expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

In this regard Employees must not engage in conduct outside of work which has the potential to:

- Affect or is likely to affect the suitability of the Employee to undertake their job role or work with children/young people or in a School setting
- Impact on the operation or reputation or standing of the School
- Impact on the operation or reputation of the School's relationship with its staff, parents, pupils, or other stakeholders
- Seriously undermine the trust and confidence that the School has in the Employee to undertake their job role or work with children/young people or in a School setting

In particular, criminal offences that involve violence, hate crime or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable.

Concerns related to an Employees actions or inactions outside of work will be reasonably considered in light of the Employees job role, and the potential impact of the Employee's suitability to do their job within the context of the School Community. If relevant, formal action may be considered following the implementation of the School's disciplinary procedure. Depending on the seriousness of any established

concerns dismissal may be a potential outcome.

### **13 Duty to Disclose**

All Employees have a duty to immediately disclose to the headteacher (or Chair of Governors in the case of a Headteacher) prior to the start of their employment, at the start of their employment or during the course of their employment, any change in their circumstances or any information which may affect or is likely to affect the suitability of the Employee to undertake their job role or work with children/ young people or in a School setting.

This includes, but is not restricted to:

- the Employee being subject to any police investigation / enquiry, arrest, ban, charge, caution, reprimand, warning, fine or pending prosecution or criminal conviction. This includes any actions committed overseas which would be subject to a police investigation or formal action if such actions had been committed in any part of the United Kingdom
- the Employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by the Teaching Regulation Agency, General Teaching Council for Scotland, or the Education Workforce Council in Wales
- the Employee being subject to the inclusion on the DBS Children's Barred List and any change in DBS status during employment, or any referral, made to, or any, investigation or proceedings being undertaken by the DBS
- the Employee being subject to any referral, made to, or any investigation, proceedings, or prohibition order being undertaken by any other regulatory or professional authorities or actions of other agencies relating to child protection and/or safeguarding concerns
- the Employee being subject to any orders made in relation to the care of children, the refusal or cancellation of registration relating to childcare, or children's homes, or being prohibited from private fostering
- the Employee being subject to any 'live' disciplinary process, formal sanction or any other relevant information arising from a previous or current secondary employment / voluntary work which may impact on the Employee's suitability to undertake their role or work with children/young people or in a School setting. This includes substantiated safeguarding allegations
- the Employee's close personal relationships outside of the workplace presenting a 'risk by association' to the safeguarding of children / young people.

This list is not exhaustive. Should an employee be unclear about whether it is appropriate to disclose a matter they are encouraged to seek guidance from the Headteacher (or Chair of Governors in the case of a Headteacher) at the earliest opportunity.

The school acknowledges the obligation to disclose protected convictions and cautions is governed by the requirements of the Rehabilitation of Offences Act 1974 (Exceptions) Order 1975 (as amended in 2013).

Prospective Employees should be aware that when applying for particular jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account.

Employees are advised that Guidance about whether a conviction or caution should be disclosed can be found here: [Check if you need to tell someone about your criminal record: What information you need to give - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/check-if-you-need-to-tell-someone-about-your-criminal-record-what-information-you-need-to-give)

Employees must also report any current or historical information in the public domain or which is likely to come into the public domain which may be of relevance to their job role or their suitability to work with children/young people or in a School setting or matters which may be subject to adverse media attention or have a detrimental impact on the reputation of the School.

### ***Childcare (Disqualification) Regulations 2009***

*These regulations apply specifically to*

- *Staff working directly with children under the age of 5 within the Early Years Foundation Stage or*
- *Staff providing 'wrap around care' (i.e. breakfast and afterschool clubs) with children up to the age of 8*

*Please delete if this requirement does not apply in your establishment*

In addition, in the case of individuals who work with, or manage the education of, early years pupils (under the age of five) during school hours, and children up to the age of eight in relation to activities outside of the school day (for example breakfast or after school club employees), the following legislative provisions also apply.

In accordance with the Childcare (Disqualification) Regulations 2009 (Section 75 of the Childcare Act 2006) an Employee should immediately disclose to the Headteacher (or Chair of Governors in the case of the Headteacher) if, at any point during their employment, they:

- Are disqualified from providing childcare provision or being involved in the management of such provision, including where any application for an Ofsted waiver from disqualification has been made, regardless of whether such an application was successful

Such employees also have a duty to ensure that they are fully aware of their obligations and will be asked by the school to confirm that they understand and comply with these provisions.

Further guidance relating to Employee's obligations under the Childcare (Disqualification) Regulations 2009 including details of the relevant offences which must be disclosed to the school is available at:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

Employees should seek clarification from the Headteacher (or Chair of Governors in the case of the Headteacher) if they are unclear whether they are required to disclose certain information under this provision.

## **How the school will respond to Employee disclosures**

Disclosures will be handled sensitively and discretely, and with regard to data protection considerations.

The Headteacher will carefully consider any disclosure which is made and the appropriate response.

This may result in a suspension from duties with normal pay while an investigation / risk assessment takes place or Ofsted waiver application made (where applicable). Suspension is not a sanction in itself and does not represent any prejudgement of the outcome of the response to the disclosure.

In instances where the information disclosed constitutes a risk to the safeguarding of children / young people or is incompatible with an Employee's job role or their suitability to work with children/young people in a School setting, termination of employment may be considered, following due process

Any failure to disclose any information required in the course of employment or any other information that may have a bearing on an individual's suitability to carry out their job role or work with children/young people or in a School setting may be the subject of disciplinary action which could lead to dismissal.

## **14 Secondary Employment**

Employees should ensure that any external paid or unpaid work does not conflict with their duty to the School or pose a potential to damage the Employee's own or the educational settings reputation with the context of their job role and seniority.

Employees must discuss with their Headteacher and obtain their consent before taking up additional paid / unpaid employment or engaging in any other business.

Requests will not be unreasonably refused providing that:

- It does not affect or is unlikely to affect the suitability of the Employee to undertake their job role or work with children/young people or in a School setting
- There is no detrimental impact on an Employee's work performance or their own or others health and safety.
- Privileged or confidential information is not shared
- Work is undertaken outside of the School and of contracted hours of work
- The activity is not in direct competition with those of the School

It is an Employee's responsibility to monitor the hours they work and ensure they are rested and refreshed to be able to carry out their role. An average working week of 48 hours across all employments should not normally be exceeded unless the Employee has elected to opt out of the Working Time Regulations.

## 15 Dress and Presentation

*Guidance Note - Schools may adapt this section to reflect any local expectations regarding dress code. Please seek guidance from your HR Connect Consultancy Team.*

An individual's dress and appearance is a matter of personal choice. However, all Employees must ensure their dress, personal appearance and standard of personal hygiene is appropriate to the nature of their role in the School, suitable for a School setting and promotes a professional image. Employees should be mindful of setting a good example to both pupils and visitors.

Dress should be appropriate to the activities an Employee is engaged in and any related health and safety requirements.

Suitable protective equipment must be worn where provided and appropriate. Uniforms should be worn where provided.

Employees should wear their identity badges at all times whilst in the workplace.

Clothes should not expose too much skin and are expected to cover areas of the body such as the midriff, chest or upper leg.

Employees should dress in a manner that is absent from political slogans, offensive language or other contentious symbols, wording or imagery.

Employees will be advised by the Headteacher of any flexibilities which may be appropriate in dress code for specific activities or events, for example for school trips and inset days or in the case of unusually hot/cold weather.

Wherever possible, tattoos should not be exposed. An Employee may be asked to cover a visible tattoo where it is deemed inappropriate / offensive for a school setting. For example, if the subject is discriminatory, violent or contentious.

Body piercings should not be exposed with the exception of earrings and also nose piercings where these are worn for religious reasons.

The School recognises the diversity of cultures and religions of its Employees and will take a sensitive approach where this affects dress and uniform requirements.

Employees are encouraged to make the Headteacher aware at the earliest opportunity of any circumstances which may have the potential to cause difficulties in following the dress code (for example, religious, medical / disability related reasons or should they be transitioning) - to enable appropriate flexibilities to be discussed and agreed.

## **16 Smoking and the use of drugs and alcohol**

The School is a non- smoking environment. Smoking and the use of e-cigarettes or “vaping” is not allowed on School premises or during working time. Staff should also refrain from smoking immediately outside of the school entrances.

Employees must not consume alcohol or use illegal drugs in the workplace or be under the influence of such substances whilst at work. This includes the use of ‘legal highs’ or psychoactive substances.

Employees must ensure that any use of alcohol / illegal drugs outside of work does not adversely affect their work performance, attendance, conduct, working relationships, health and safety of themselves and others or damage the School’s image and reputation. Employees are expected to behave in a manner which would not lead any reasonable person to question their suitability to work with children or act as a role model. For example, presenting for work with clothing or breath smelling of alcohol or drugs is likely to raise reputational concerns.

If an Employee has a drug or alcohol dependency which is impacting on their work or has the potential to impact on their work, they should discuss this with the Headteacher. Where an Employee engages with the school regarding addressing their dependency, consideration will be given on how to best to support the Employee. External advice may be sought prior to or during the implementation of the Schools disciplinary procedure where conduct issues arise due to alcohol or drug use.

## **17 Health and Safety at Work**

All Employees must, by law, take reasonable care for their own health and safety and that of others in the workplace.

Employees are required to comply with the School's Health and Safety policy and agreed procedures at all times.

This includes:

- avoiding risk of injury or danger to yourself or others
- using any protective clothing and equipment supplied
- complying with hygiene requirements
- reporting, at the earliest opportunity, any hazards, defects, accidents or incidents to the Headteacher or other designated person
- not interfering with, or misusing, anything provided for health, safety or welfare
- informing the School of any medical condition or medication which has been prescribed which may have an impact on health and safety in the workplace

Employees with specific additional responsibilities and those in managerial roles should also be aware of and comply with any additional health and safety obligations associated with their role.

Employees should inform their manager if they have a medical condition or are taking prescription medication which may impair their work performance or affect their health and safety or that of others.

*Please also refer to the School's Health & Safety Policy*

## 18 Contact with the Media

All enquiries from the media should be directed to the Headteacher.

Employees should not make contact with or comment to the media about matters relating to the School without the prior approval of the Headteacher.

Employees should speak to the Headteacher in the first instance about any concerns they have regarding their own employment or operation of the school and / or may refer to the School's Whistleblowing or Grievance policies if they wish to raise a formal complaint.

Should an Employee speak directly to the media about non-school matters care should be taken to ensure that any opinions expressed are personal and that the individual is not acting on behalf of / representing the School.

Any contact with the media in a personal capacity should be compatible with the Employee's role and their position working with children / young people or in a school setting and must not negatively impact on the reputation of the school.

## 19 Whistleblowing

Employees may raise concerns about any aspect of the operation of the School which is not directly related to their own employment through the Whistleblowing Policy.

Employees raising a concern with reasonable grounds for doing so will not be subject to discrimination, harassment or victimisation.

*Please also refer to the School's Whistleblowing Policy*

## 20 Misconduct

Failure to follow the Code of Conduct may result in further action being taken, as set out in the Schools Discipline and Conduct Policy and Procedure.

Employees should ensure they are familiar with type of conduct which may be regarded as a breach of School rules.

Examples of behaviours which are likely to be regarded to constitute gross misconduct and misconduct are set out in the Appendix to the School's Discipline and Conduct Policy and Procedure. Allegations of misconduct will be managed in accordance with the School's Discipline and Conduct Policy.

*Please also refer to the School's Discipline & Conduct Policy and Procedure*

## Part C: Safeguarding Pupils / Students

### 21 General Obligations

It is essential that everybody working in a School understands their safeguarding responsibilities.

All Employees have a responsibility to:

- Safeguard pupils / students from physical abuse, sexual abuse, emotional abuse and neglect
- Promote the welfare of pupils / students and provide a safe environment in which children can learn
- Identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm
- Report as soon as possible and without delay any concerns regarding child protection / safeguarding to the Headteacher / Designated Safeguarding Lead (or Chair of Governors where concerns relate to the Headteacher)

All Employees must ensure they have read, understood and comply with the current edition of the following documents:

- Part 1 of Keeping Children Safe in (KCSIE)
- KCSIE Section Two - Concerns which do not meet the harm threshold
- KCSIE is attached at Appendix 4 or via <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
-  School's Child Protection Policy
- The School's Behaviour Management Policy
- Additionally, Employees with managerial responsibilities must ensure they comply with the School's procedure for Managing Allegations Against Staff and Parts 2-4 of Keeping Children Safe in Education and Safeguarding Procedures for Managing Allegations Against Staff

Employees must attend and comply with any training as required by the School associated with the safeguarding of pupils / students.

**Staff must report any concern about their own conduct or the conduct of another adult working in or on behalf of the School, including concerns which may appear low level.**

**Where staff are required to work with a pupil on a one-to-one basis, they should do so openly and in accordance with the School's safeguarding**

**and safer-working procedures. Staff should avoid secluded areas and closed-door situations wherever possible.**

**Employees must maintain clear professional boundaries with pupils at all times. This includes avoiding favouritism, over-familiarity, unnecessary physical contact, sharing excessive personal information, inappropriate private communication or any behaviour that could reasonably be perceived as grooming or boundary-testing.**

## **22 Appropriate relationships with students**

Employees must maintain appropriate professional boundaries with pupils / students.

Employees are expected to act in an open and transparent way that would not lead any reasonable person to suspect their actions or intent. In order to protect both children and themselves, Employees should also avoid behaviour that might be misinterpreted by others.

Where concerns are raised appropriate fact finding will be undertaken before considering whether further formal action is warranted under the Schools disciplinary procedure.

## **23 Allegations Against Members of Staff and Volunteers**

All Employees have a duty to report to the Headteacher / DSL at the earliest opportunity the conduct of a colleague who may have breached the 'harm threshold' as defined in KCSIE in that they have:

- Behaved in a way that has harmed a child or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates the individual may pose a risk of harm to children and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Employees are advised to self report where they themselves believe they may have acted in a manner which breaches these harm thresholds.

Failure to report such concerns may be regarded as a disciplinary matter. Where the concerns relate to the Headteacher these should be reported to the Chair of Governors. Please refer to Appendix 6 for the School's policy on the management of low level safeguarding concerns.

## **24 Guidance for Safer Working Practice**

Employees are required to read, understand and comply with the Guidance for Safer Working Practice for those working with Children and Young People in Education Settings.

This guidance is attached at Appendix 5 or can be accessed online via:

[Managing staff allegations - KELSI](#)

This document explains the School's specific expectations with regard to safeguarding pupils / students and contains practical guidance on behaviours which constitute safe working practice.

Employees should seek immediate guidance from their Headteacher / Line Manager if they are unclear about the conduct or actions expected of them.

*Schools may wish to add further details about their specific expectations regarding safer working practice here*

## 25 Other Safeguarding Considerations

All staff should have an awareness of safeguarding issues that can put children at risk of harm and how to deal with these accordingly. These include:

- Child on Child abuse - including bullying (cyberbullying, prejudice-based and discriminatory bullying)
- Sexual Violence & Harassment - abuse of intimate relationships, physical abuse, sexual abuse & harassment, non-consensual sexual activity/sharing of images, upskirting and initiation/hazing type violence and rituals.
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- Domestic Abuse - including psychological, physical, sexual, financial or emotional abuse.
- Mental Health - including the impact of suffering abuse or neglect
- Radicalisation - including the Prevent agenda
- Serious Violence - including Female Genital Mutilation (FGM), honour-based abuse and forced marriage.

Employees are guided to refer to the current edition of Keeping Children Safe in Education for further information.

## Part D: ICT and Social Media

*Please also refer to the School's ICT Acceptable Usage Policy / E Safety Policy*

## 26 General Obligations

Employees should ensure that they have read, understand and comply with the School's ICT Acceptable Use Policy at all times (Attached at Appendix 7).

Whilst at work or using a work device all Employees must:

- Ensure all electronic communication with pupils / students, parents / carers, colleagues and other stakeholders is compatible with their professional role, appropriate boundaries and in line with School policies.
- Not to use work IT equipment to browse, create, transmit, display, publish or forward any material / images which is illegal, sexually explicit, obscene or could offend, harass or upset others or anything which could bring an Employee's professional role or the School / Local Authority into disrepute.
- Not to use personal IT equipment to browse, create, transmit, display, publish or forward any materials / images which are illegal or could offend or harass others or anything which could bring an Employee's professional role or the School / local authority into disrepute.
- Ensure that ICT system security is respected and password protocols are observed - including the use of strong passwords and encryption.
- Not install personal software on School equipment or make unauthorised copies of School registered software.

Limited use of School internet, email and ICT equipment for personal purposes is permitted, provided this is within the scope of the School's ICT Acceptable Use Policy and does not impact on an individual's job role.

Access to gaming, gambling, social networking sites or internet chatrooms from School devices is not permitted

Any online safeguarding concern, including concerning content, contact, communication or images involving a pupil, must be reported through the School's safeguarding procedures.

Employees using generative artificial intelligence or other digital tools in connection with their work must comply with the School's data protection, safeguarding, confidentiality and acceptable-use arrangements and must not enter confidential or personal information into an unapproved service.

Employees must not create, share, request or store inappropriate images or other harmful content involving children. This includes digitally altered, manipulated or AI-generated images or videos.

Employees must not use personal messaging, social-media, gaming or other online platforms to communicate privately with pupils unless this is an approved school communication channel and is undertaken in accordance with school procedures.

Employees must maintain appropriate professional boundaries in all online communication and digital interactions with pupils, parents/carers and colleagues.

## 27 Use of Social Media

Employees must ensure that their online presence / profile is compatible with their professional role.

Employees are entitled to their private life but should be mindful that their online presence can be subject to public scrutiny. It is important that the wider community are confident that pupils are being educated by individuals who act in a professional and responsible manner online.

All Employees should:

- Ensure appropriate privacy settings are applied when using social media sites
- Refrain from sharing confidential / privileged information, discussing incidents, operational or employment matters or making critical / negative comments about the School / pupils / parents or colleagues on such forums
- Not browse, create, transmit, display, publish, comment on or forward any material / images which is illegal, could offend or harass or anything which could bring an Employee's professional role or the School / Local Authority into disrepute. For example, 'hate speech' - expressing unacceptable views related to protected characteristics such, as race, sex, disability, age or gender reassignment would be unacceptable.
- Never share / post images of pupils
- Not post images of work colleagues without permission.
- Not access or update social media sites using school devices / during working time

Employees should not make contact with student / pupils or parents via social media accounts or have these individuals as social media 'friends' / 'contacts'. It is also recommended that Employees do not have ex- pupils or their families as social media 'friends'/'contacts'.

Employees at schools can often have more complex relationships than just being a member of staff. As examples, staff can also be parents (of pupils at the school), in relationships or have friendships with other staff or parents, or also governors. Staff are advised to report any pre- existing social media relationships to the Headteacher for their own protection.

Employees should seek guidance from their Headteacher / Line Manager if they are unclear about the conduct or actions expected of them.

Staff must not use personal devices in toilets, changing areas or other situations where children may reasonably expect privacy.

Personal devices must never be used to photograph, film, audio-record or otherwise capture pupils unless specifically authorised in accordance with School procedures.

Personal mobile phones and other personal smart devices must be kept out of sight and not used when staff are teaching, supervising or otherwise responsible for pupils, except where their use is specifically authorised for a legitimate work or emergency purpose.

## **28 Use of Personal Mobile Phones / Devices**

Employees are not permitted to make / receive personal calls / texts, send / receive emails or access internet / social media during work time where children are present.

Employees should ensure that mobile devices are silent at all times whilst in the classroom or where children are present. Mobile devices should not be left on display.

Employees should not use their personal equipment (mobile phones / cameras / tablets) to take photos or make recordings of pupils / students *unless given explicit instruction to do so by the headteacher or chair of governors in respect of the headteacher*

## **29 Monitoring of Usage**

Emails, documents or browsing history on School systems should not be considered to be private and may be monitored and recorded to ensure the safety of pupils / students and ensure compliance with this policy. This monitoring will be proportionate and will take place in accordance with data protection / privacy legislation.

The School may address concerns regarding unauthorised, unacceptable or inappropriate use of ICT systems / devices or social media as a disciplinary matter.

# **Part E: Business Conduct**

## **30 Use of Financial Resources**

The School requires Employees to observe the highest standards of business / financial practice.

Employees should ensure that School / public funds with which they are entrusted are used in a responsible and lawful manner.

Employees must comply with the School's stipulated financial regulations and any other relevant policies / audit requirements.

Appropriate authorisation should be sought for any expenditure and audit trail / suitable records kept.

School monies, credit / debit cards and accounts should not be used for personal purposes.

The use of personal credit cards / accounts to purchase goods and services on behalf of the School should be avoided unless prior agreement from the Headteacher is obtained (or from the Chair of Governors in the case of the Headteacher).

All expense claims for travel and subsistence should be appropriately authorised and accompanied by receipts / proof of purchase.

Personal loyalty cards should not be used when making purchases on behalf of the School.

*Please also refer to the Local Authority's School Financial Control Guidance and the School's Finance Policy*

### **31 Personal Use of Equipment and Resources**

Employees may not make personal use of the School's property, materials or facilities unless authorised to do so by the Headteacher.

### **32 Declaration of Interests**

The School recognises that Employees may wish to take an active role in the local community and undertake additional personal / business activities outside of work.

In the majority of instances such activities will have no impact on their role in School. However, on occasion there may be a potential conflict of interest.

Employees should therefore declare annually to the Headteacher any financial or non financial interests which may conflict with those of the School. Employees should also declare membership of any professional bodies / organisations which may conflict with their School role.

Should Employees be in doubt about whether a conflict of interest may exist they should seek guidance from the Headteacher (or Chair of Governors in the case of the Headteacher).

### **33 Contracting out of Services**

Employees should follow agreed School protocols for the award of contracts to external providers.

Employees should adhere to School rules regarding the separation of roles in procurement / tendering process.

In particular care should be taken to ensure competition between prospective contractors is fair and open and that all competing parties are treated equally.

Employees should ensure that preferential treatment is not shown to current / former Employees or partners, close relatives or friends / associates in the award of contracts.

Employees must not accept any form of financial or other inducement which may be offered by a potential contractor. All such approaches should be reported to the Headteacher (or chair of governors in the case of the Headteacher).

Confidential information relating to the tendering process, must not be disclosed to any unauthorised party or organisation.

### **34 Gifts and Hospitality**

Employees should not accept significant gifts from parents / carers, pupils / students, actual or potential contractors or outside suppliers which could compromise the individual or the School.

Employees should notify the Headteacher should they receive any unsolicited gifts and return the item with a polite refusal letter to the sender. A record should be kept of all gifts which are received.

Small tokens of appreciation which have no substantial financial value such as presents from pupils / students at the end of term may be accepted and do not have to be declared.

Employees may only accept an offer of hospitality if there is a genuine need to do so in order to represent the School in the community. Employees should discuss any invitations with the Headteacher (or Chair of Governors in the case of the Headteacher).

Where the School receives sponsorship of a School activity / event, care should be taken to ensure that this does not infer that the sponsor will receive preferential treatment in any future contracting / tendering process. An Employee or their partner, family member or friend may not benefit from the sponsorship.

### **35 Personal Relationships at Work**

Employees must not allow a personal relationship with a colleague, parent, pupil Governor or member of the wider school community to influence their conduct at work or have a detrimental impact on the operation of the school.

A personal relationship may be defined as:

- A family relationship
- A romantic / sexual relationship
- A close personal friendship outside of work
- A business, commercial or financial relationship

Employees who are in a personal relationship should behave in an appropriate and professional manner. A personal relationship must not:

- advantage or disadvantage the parties in the relationship
- give rise to an actual or perceived conflict of interest
- impact adversely on other members of the school community
- lead to a breach in confidentiality
- breach standards of professional behaviour or conduct in the workplace

Personal relationships should be declared to the Headteacher\*

The Headteacher may consider proportionate action to manage any detrimental consequences and / or conflict of interests arising from workplace relationships -this may include a change in duties or line management arrangements. Any such action will be taken through discussion and, wherever possible, with the agreement of the parties involved.

**Relationships with pupils / parents** Employees are expected to disclose to the Headteacher\* where a personal relationship exists or develops with a parent of a pupil or where there is a pre-existing family connection or friendship with a pupil and / or their family. There will be no requirement to give a detail account of the involvement.

Where an individual is employed in a school in which their child / family member is a pupil, they should ensure that appropriate professional boundaries are maintained. In these circumstances Employees should follow the same rules expected of other parents including raising any concerns using the appropriate parental procedures. Employees who are parents should also exercise appropriate professionalism with regards to access to confidential pupil / student information.

#### **Relationships between colleagues**

Employees are expected to disclose to the Headteacher\* any close personal relationship with a colleague. There will not be a requirement to give a detailed account of the involvement.

Where a personal relationship exists or develops between members of staff where one party is in a supervisory relationship they must not be involved in the recruitment, appraisal, promotion, pay determination, authorisation of expenses / overtime,

provision of an employment reference on behalf of the School or any other management decision involving the other party.

Failure to disclose a personal relationship or a breach in the expected standards of conduct arising from a personal relationship may be addressed as a disciplinary matter.

\*In the case of the Headteacher any disclosures should be made to the Chair of Governors.

### **36 Political Activity**

Employees must not allow their own personal, political, religious or other views and opinions to interfere with their work. They are expected to be neutral in their views in the course of their work at the school and to present a balanced view when working with pupils.

Employees may engage in political activity outside of work - however they should not allow personal / political views to interfere with their duties. Any activity should be compatible with the Employee's responsibility as a role model to pupils / students.

Where an Employee is involved in political activity outside of work - care must be taken to ensure that it is clear that any opinions expressed are personal and that the individual is not acting on behalf of / representing the School.

### **37 Intellectual Property**

Any intellectual property created by an Employee during the course of their employment and for the purposes of their employment will be considered the property of the school unless specific permission is granted to the Employee to have ownership of such materials.

### Key safeguarding updates for September 2026

- Staff must model respectful behaviour and challenge inappropriate, discriminatory, sexist or misogynistic language and behaviour.
- AI and other digital tools must be used in accordance with safeguarding, confidentiality and data-protection requirements.
- Staff must follow the School's arrangements for personal mobile phones, photography, recording and digital communication.
- Professional boundaries apply to face-to-face, online and digital interactions.
- Staff must follow the School's safeguarding procedures and report concerns promptly, including concerns about adults and low-level concerns.
- All staff must read Part One of KCSIE 2026 in full.

## Appendix 1: Code of Conduct - Confirmation of Compliance

Please sign the declaration below and return :

I hereby confirm that I have read, understood and agree to comply with the provisions of the school's code of conduct.

Should I have any queries about any aspect of the code or am unclear of the school's expectations I will discuss these with the Headteacher at the earliest opportunity.

Name:

Job Title:

Signed:

Date:

*(It is suggested that Employees should re- read this policy on an annual basis to ensure they are familiar with any changes which have been made)*

## **Appendix 2: List of Relevant Policies**

As outlined above

## **Appendix 3: Teachers' Standards - Part 2**

<https://www.gov.uk/government/publications/teachers-standards>;

Appendix 4: Keeping Children Safe in Education 2026 – Part One

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>;

## **Appendix 5: Guidance for Safer Working Practice**

[http://www.kelsi.org.uk/\\_data/assets/pdf\\_file/0016/46510/Guidance-for-safer-working-practice-working-in-education.pdf](http://www.kelsi.org.uk/_data/assets/pdf_file/0016/46510/Guidance-for-safer-working-practice-working-in-education.pdf);

## Appendix 6: Policy for the Management of Low Level Safeguarding Concerns

### *Guidance Note*

*This policy has been developed to comply with the requirements of Part 4 Section 2 of Keeping Children Safe in Education regarding provisions for the management of 'low level' safeguarding concerns which do not meet the 'harm threshold'.*

*Schools may develop their own policies or adapt / amend this model so long as they are consistent with the requirements of KCSIE. Schools and Academies should ensure this policy is consistent with any Local Authority / LADO advice issued on this matter.*

### **Part A: Policy**

#### **1 Policy Statement**

Safeguarding and promoting the welfare of children is the responsibility of all Employees.

The School Code of Conduct sets out the expected standards of behaviour and conduct of all Employees and adults working in and on behalf of the School, including expectations with regards to the safeguarding of children.

The School recognises the importance of reporting, addressing and recording, where appropriate, all safeguarding concerns, regardless of their apparent level of severity.

The School seeks to create an open and transparent working environment in which individuals are able to share any safeguarding concerns about their own behaviour or the behaviour of another member of the School Community - no matter how small they may appear to be. In doing so the School endeavours to embed a culture where the

school's values and expected standards of conduct are reinforced by the entire school community.

This policy also provides a framework through which sensitive, timely and appropriate action can be taken to identify and address any potential inappropriate behaviour or patterns of behaviour and individuals can be supported to correct their conduct at an early stage.

This policy and procedure covers the management of 'low level concerns' and explains:

- What constitutes a 'low level' concern
- How staff should report a concern
- How the school will manage and respond to concerns
- How concerns will be reported and recorded.

## 2 Scope

This policy and procedure applies to all employees and all adults working in and on behalf of the school (including supply and agency staff, volunteers, Governors and contractors)

This policy should be read in conjunction with:

- the School Code of Conduct, Guidance for Safer Working Practice (for Schools outside of Kent please refer to the relevant LA guidance as appropriate)
- the Procedure for Managing Safeguarding Allegations against Children,
- Part 1 of Keeping Children Safe in Education 2026 (KCSIE) - Safeguarding Information for all Staff
- Part 4 Section 2 of Keeping Children Safe in Education (KCISE) - Concerns that do not meet the harm threshold.
- Working Together to Safeguard Children 2026

### *Note on terminology*

*Reference to 'Employees' in this document should be considered to also include all adults working in the school who are not employees in the legal definition and would include volunteers /supply and agency workers and Governors and contractors.*

## 3 Definition

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is defined in KCSIE 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 may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work which has the potential to impact on their suitability to work with children considering their job role and
- does not meet the harm threshold as defined in KCSIE or is otherwise not serious enough to consider a referral to the LADO.

Low level concerns should be distinguished from concerns or allegations which may meet the harm threshold as defined in KCSIE, where an individual may have:

- Behaved in a way that has harmed a child or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates the individual may pose a risk of harm to children and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Examples of behaviour which may give rise to a low level concern may include, but is not limited to:

- being over friendly with pupils / students
- having favourites
- taking photographs of pupil / students contrary to school policy
- not observing appropriate boundaries with regards to physical contact with pupils / students
- not observing appropriate professional boundaries with regards to sharing personal information with pupils / students
- engaging with a pupil / student on a one-to-one basis in a secluded area or behind a closed door
- humiliating or belittling children
- using inappropriate language towards pupils / students or in their presence.

It is important to note that not all instances of behaviour of this kind will automatically constitute a 'low level concern' and there may be occasions where conduct does meet the 'harm threshold'. It is for the Headteacher to determine the appropriate action with regards to the context in which the conduct occurred and the severity of the concern.

A low level concern may also relate to an individual's conduct or behaviour outside of the workplace or relationship with others where this gives rise to concerns about their suitability to work with children or in a school setting.

Such behaviour may exist on a wide spectrum from the inadvertent or thoughtless actions to intentional or deliberate acts where the Employee is knowingly in breach of expected standards of behaviour or school policies.

Concerns may arise through direct observation of behaviour by the person reporting it or by complaint or disclosure made by a parent, child, or other adult within or outside of the School. Concerns may also be raised by other agencies or professionals external to the School.

It is important to note that it is not for the individual raising the concern to identify whether the behaviour is 'low level' - however they do have a responsibility to share concerns as part of a School culture which promotes the safeguarding of children.

#### **4 Roles and Responsibilities**

Reference to the role of the Headteacher in this policy may include his / her nominee -including the Designated Safeguarding Lead.

However, it should be noted that the Headteacher retains overall responsibility for the appropriate identification and management of low level concerns.

Where a concern is raised regarding the conduct of the Headteacher, the Chair of Governors has responsibility for ensuring any appropriate actions are taken.

#### **Part B: Procedure**

##### **5 Reporting a concern**

*School to determine how a concern should be reported*

Reports of concerning behaviour should be made as soon as it arises in writing (School to specify if a form is to be used) or via an electronic reporting tool (school to specify)

Concerns should be reported as soon as they arise to the Headteacher / DSL or their designated nominee

Concerns relating to the Headteacher, should be reported to the Chair of Governors

An Employee is advised to self report where, for example, they may have found themselves in a compromising situation which has the potential to be misinterpreted or appear compromising to others and / or where they themselves believe they have acted in a manner which falls below the expected standards of conduct

The name of the person raising the concern should be provided. Where an individual wishes to remain anonymous this will be respected as far as is reasonably practical.

Should a concern relate to an agency worker / contractor the Headteacher will report this to their employer who will be responsible for identifying any inappropriate patterns of behaviour and taking any necessary action.

## **6 Evaluating a concern**

Employees are advised that the details of “low level concerns” may be shared with the LADO enquiry service to support the School in its decision making regarding any actions which may be appropriate. This permits concerns to be evaluated objectively and to ascertain whether concerns of a similar nature may have already been reported to other Schools or the Local Authority.

Guidance may also be sought from the Designated Safeguarding Lead - however it is important to note that the Headteacher is ultimately responsible for decisions and actions relating to the management of low-level concerns.

The Headteacher will gather as much information as possible relating to the concern by:

- speaking directly to the person who raised the concern
- speaking to any potential witnesses
- speaking to the individual about whom the low-level concern has been raised.

As far as possible, enquiries will be made discreetly and sensitively - with consideration being given to the support required by all parties involved. The individual about whom the concern has been raised will have full opportunity to explain their actions and any mitigation.

The information gathered will be objectively assessed by the Headteacher in order to establish whether:

- The behaviour is appropriate and consistent with the Staff Code of Conduct and any professional / legal requirements
- The behaviour constitutes a low-level concern as described in this policy
- The behaviour in and of itself may meet the harm threshold and should be referred to the LADO and / or other agencies
- When considered with any previous low-level concerns relating to the same individual, a pattern of behaviour is identified which may meet the harm threshold and should be referred to the LADO and / or other agencies

## **7 Acting on a concern**

The actions taken will be determined by the assessment which has been made of the concern.

Where behaviour is determined not to constitute a breach in the Staff Code of Conduct, expected standards of behaviour and any professional / legal requirements the Headteacher will:

- Provide feedback to the individual about whom the concern has been raised as to the outcome of their enquiries - this may include providing the

individual with guidance to prevent a repetition of concerns or perceived concerns

- Consider any training which may be relevant to individuals / whole staff group or any review of policies / practices which may be appropriate

Where behaviour is determined to constitute a 'low level concern' the Headteacher will:

- Provide feedback to the individual about whom the concern has been raised and the outcome of their enquiries - explaining why their behaviour has been identified as a low-level concern and the future standards of behaviour required
- Discuss what support, training, guidance the individual may require to achieve and maintain the expected standards
- Explain any monitoring or review arrangements which may be relevant - including an action plan or risk assessment where appropriate
- Explain the potential consequences should there be future repetition of the behaviour or similar behaviours or a similar pattern of behaviour. Consider any training which may be relevant to individuals / whole staff group or any review of policies / practices which may be appropriate

Some low-level concerns may raise issues of potential performance capability or disciplinary misconduct. Should this be the case the Headteacher will consider whether it is appropriate for these to be managed via the performance capability or discipline and conduct policies and procedures. Guidance may be sought from the School's HR Consultant as appropriate.

- Where a concern is assessed that it may meet the 'harm threshold'

The School will seek guidance from the LADO and follow their policy for Managing Safeguarding Allegations against staff.

## 8 Record keeping

### *Guidance Note*

*KCSIE states that Schools and Academies may determine how records are kept providing they are held confidentially, securely and in accordance with Data Protection Requirements. Similarly Schools and Academies can determine the period records will be retained. Schools may therefore determine different arrangements to those suggested below*

The Headteacher will keep appropriate written records of all concerns including:

- The details of the concern, including the context in which it arose
- All internal enquiries relating to the concern raised
- All external exchanges with the LADO and other agencies regarding the concern
- Their assessment as to how the concern should be categorised - including the rationale for their decision
- Any follow up action taken and / or guidance issued to the employee

Where multiple low-level concerns are raised about the same individual over a period of time - these will be recorded chronologically in order to capture the pattern of behaviour.

These records will be held confidentially and securely in central low level concerns management file which is separate to other staffing records.

Only the Headteacher and other designated senior staff (school may choose to specify the postholders) may have access to these records.

Records of low-level concerns that have been raised will be retained on file until the Employee leaves employment and for 6 years after this date

## **9 Employment References**

The School will include details of substantiated safeguarding concerns which meet the harm threshold within any employment reference.

Low level concerns will not be included within an employment reference unless they relate to issues which would normally be included within a reference such as misconduct or poor performance

However patterns of inappropriate behaviour which may initially be managed as a low-level concern but which, due to their repeated occurrence, are subsequently deemed to meet the harm threshold and are found to be substantiated may be included in an employment reference.

## **10 Monitoring**

The Headteacher will review the central low level concerns file to consider whether there are patterns of concerns being raised which might indicate a wider cultural issue with the safeguarding of children in the School - this may help to inform the revision of School policies / procedures or any whole school staff training which may be needed.

Anonymised data may also be shared with the Governing Body for the purpose of ensuring School has appropriate and effective measures in place to manage low level concerns.

## **11 Confidentiality and Data Protection**

All parties are required to respect the confidentiality of all information relating to ‘low level concerns’.

The School recognises its obligations under the General Data Protection Regulation and associated legislation and the rights of Employees with regards to the personal data held on them.

All records relating to the management of low level concerns will be gathered, processed, held and shared in accordance with the requirements of the General Data Protection Regulations and Data Protection Act.

All records and information are a matter of confidence between the School, the Employee and relevant advisors including the LADO service and HR provider.

## **Appendix 7: ICT Acceptable Use & E Safety**

## Policy

*School to attach own policy document*