



Staff Code of Conduct and Low Level Concern Policy

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1. Aims, scope and principles

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

By creating this policy, we aim to ensure our school is an environment where everyone is safe, happy and treated with respect.

Many of the principles in this code of conduct are based on the Teachers' Standards. School staff have an influential position in the school and will act as role models for pupils by consistently demonstrating high standards of behaviour.

We expect that all teachers will act in accordance with the personal and professional behaviours set out in the Teachers' Standards. We expect all support staff, governors and volunteers to also act with personal and professional integrity, respecting the safety and wellbeing of others.

Our core Christian values are: Love, Courage and Respect, and we have these core Christian values for the whole school community and not just the children.

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our staff disciplinary procedures.

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement and act in the best interests of the school and its pupils.

2. Legislation and guidance

We are required to establish procedures for the regulation of staff conduct under regulation 7 of [The School Staffing \(England\) Regulations 2009](#).

In line with the statutory safeguarding guidance [Keeping Children Safe in Education](#), we should have a staff code of conduct, which should cover low-level concerns, allegations against staff and whistle-blowing, as well as acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications, including the use of social media.

3. General obligations

Staff set an example to pupils. They will:

- Maintain high standards in their attendance and punctuality;
- Never use inappropriate or offensive language in school;
- Treat pupils and others with dignity and respect;
- Show tolerance and respect for the rights of others;
- Take a zero-tolerance approach to any form of sexism, racism, misogyny/misandry, homophobia, transphobia, biphobia, sexual violence, sexual harassment, and derogatory behaviour;
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs;
- Not express personal beliefs in a way that exploits pupils' vulnerability or might lead them to break the law;
- Understand the statutory frameworks within which they must act;
- Adhere to the Teachers' Standards.

4. Safeguarding

Staff have a duty in line with Keeping Children Safe in Education (KCSIE) to safeguard pupils from harm, and to report any concerns they have. This includes:

- Physical, emotional and sexual abuse
- Bullying, cyberbullying or discriminatory bullying
- Sexual violence or sexual harassment
- Online harm
- Neglect
- Domestic abuse affecting the child
- Mental health concerns that may also be safeguarding concerns
- Female genital mutilation (FGM) concerns, and
- All forms of exploitation and modern slavery

Staff must read our child protection and safeguarding policy and procedures, and the Prevent duty, and ensure they are aware of the processes to follow if they have any concerns about a child.

Our child protection and safeguarding policy and procedures are available on the school website and can be found on the noticeboard in the staff room. New staff will also be given copies on arrival.

All staff will read at least part 1 of [Keeping Children Safe in Education \(KCSIE\)](#) in full and make sure they understand their roles and responsibilities as set out in the guidance. If any staff have any concerns or questions about the contents of part 1 of KCSIE, these must be raised as soon as possible to the headteacher.

4.1 Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that anyone working in the school, including a supply teacher, trainee teacher, volunteer, self-employed staff member working at the school and third parties including contractors, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they 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 – this includes behaviour taking place inside or outside of school

All staff should report any allegations using the reporting procedures set out in our child protection and safeguarding policy. We will deal with any such allegation quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, deputy headteacher (or the chair of governors where the headteacher is the subject of the allegation).

4.2 Low-level concerns about members of staff

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. We work 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.

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. '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"

For example, this may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they can't easily be seen
- Humiliating pupils

Low-level concerns can include inappropriate conduct inside and outside of work.

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. 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.

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

Dealing with a low-level concern

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.

The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and must 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.

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.

Recording a low-level concern

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). 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 is possible).

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low-level concerns more easily to identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Reviewing a low-level concern

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

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).

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

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.

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.

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 usually be included in a reference.

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.

If there is any doubt about the level at which behaviour needs to be addressed, LADO advice will be taken.

4.3 Whistle-blowing

Whistle-blowing reports wrongdoing that it is “in the public interest” to report. Examples linked to safeguarding include:

- Pupils’ or staff members’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Attempts to cover up the above, or any other wrongdoing in the public interest

Staff are encouraged to report suspected wrongdoing as soon as possible. Their concerns will be taken seriously and investigated, and their confidentiality will be respected. However, anonymity is not automatically guaranteed. The school aims to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken. ~

Staff should consider the examples above when deciding whether their concern is of a whistle-blowing nature. Consider whether the incident(s) was illegal, breached statutory or school procedures, put people in danger or was an attempt to cover any such activity up.

Staff should report their concern to the headteacher or deputy headteacher. If the concern is about the headteacher or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the chair of the governing body.

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

For our school's detailed whistle-blowing process, please refer to our whistle-blowing policy.\

5. Sexual harassment

Sexual harassment is any unwanted physical, verbal or non-verbal conduct of a sexual nature that has a purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It also includes treating someone less favourably because they've submitted or refused to submit to unwanted conduct of a sexual nature in the past, or harassment related to sex or gender reassignment. When this behaviour is unwanted, it includes (but isn't limited to):

- Unwanted physical conduct or 'horseplay' including touching, pinching, pushing and grabbing
- Continued suggestions for sexual activity after it has been made clear that such suggestions are unwelcome
- Sending or displaying material that is pornographic, or that some people might find offensive
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless)
- Offensive emails, text messages or social media content
- Comments and jokes of a sexual nature
- Sexually suggestive looks and staring
- Sexual propositions and advances
- Promising things in return for sexual favours
- Physical contact such as massaging, hugging or kissing
- Sexual contact on social media

Staff will help create a positive environment that works to prevent sexual harassment. This includes calling out sexual harassment that they witness. All witnesses will be provided with appropriate support and will be protected from victimisation.

If a staff member is concerned at any point about incidents of sexual harassment (either directed at them or someone else), they should report their concern to the headteacher or deputy headteacher. If the concern is about the headteacher or deputy headteacher or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to chair of governors. The school will investigate any complaints in a timely, respectful and confidential manner.

All staff will receive training on recognising and responding to incidents of sexual harassment. The school will monitor the treatment and outcomes of any complaints of sexual harassment or victimisation received to make sure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved and workforce training is targeted where needed.

6. Staff-pupil relationships

Staff will observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- This takes place in a public place that others can access;
- Others can see in to the room;
- A colleague or line manager knows this is taking place.

Staff should avoid contact with pupils outside of school hours if possible. If unable to do so, professional boundaries should be observed. Staff should not engage in activities outside work which could damage their own reputation, the school's reputation or the reputation of the school's pupils and/or employees.

Personal contact details should not be exchanged between staff and pupils. This includes social media profiles.

While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are not acceptable.

If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, or if a staff member is concerned at any point about a fellow staff member and a pupil, this should be reported in line with the procedures set out in our child protection and safeguarding policy.

Any inappropriate relationship between staff and a pupil will be investigated and the staff member may be subject to the school's disciplinary policy. Their actions may be considered as gross misconduct, which could lead to summary dismissal and referral to professional regulatory bodies. In suspected cases of an abuse of position of trust, the school may report those concerned to the police.

7. Communication and social media

School staff's social media profiles should not be available to pupils. If staff have a personal profile on social media sites, they should not use their full name, as pupils may be able to find them. Staff should consider using a first and middle name instead, and set public profiles to private. Refusal to do so could result in disciplinary action being taken in line with the school's disciplinary policy.

Where possible, staff members should not list their workplace on social media platforms.

Staff should not attempt to contact pupils or their parents via social media, or any other means outside school, in order to develop any sort of relationship. They will not make any efforts to find pupils' or parents/carers' social media profiles. If staff are friends with parents online due to knowing the person outside of school, then they should be transparent in informing the headteacher or deputy headteacher. They should not comment on social media posts or communicate outside of school (e.g. by text, telephone, instant messenger) on any school related matters.

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

Staff should be aware of the school's online safety procedures and what to do if these are breached in any way.

8. Acceptable use of technology

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

Staff will not use personal mobile phones and laptops, or school equipment for personal use, in school hours or in front of pupils. Any personal use must be in the employee's own time (for example, before or after working hours or during unpaid lunch breaks). All personal use must comply with the standards and restrictions set out in this code of conduct, mobile phone policy and acceptable use of IT policy.

Staff will not use their personal mobile phones or similar devices to take pictures of pupils.

It is a criminal offence to take and share nude or semi-nude images, including those generated by AI, of anyone under the age of 18.

With the exception of pre-school labelled iPads, laptops or devices required for medical reasons, mobile phones, cameras and other electronic devices with imaging and sharing capabilities are not allowed in the pre-school setting under any circumstance. Secure storage is provided.

We have the right to monitor emails and internet use on the school IT system.

There may be occasions where it is appropriate for staff to use a mobile phone or similar device for professional duties, such as:

- Setting homework
- Recording rewards and sanctions
- Using multi-factor authentication

All staff must consistently enforce the school's policy on mobile phones being prohibited for pupils throughout the school day.

Any misuse of IT systems, either during work-related duties, working hours or outside of working hours will be a breach of the code of conduct and may result in disciplinary action being taken in line with the school disciplinary policy.

9. Confidentiality

In the course of their role, members of staff are often privy to sensitive and confidential information about the school, staff, pupils and their parents/carers.

This information should never be:

- Stored or handled in a way that breaches data protection laws, including the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025
- Disclosed to anyone unless required by law or with consent from the relevant party or parties
- Used to humiliate, embarrass or blackmail others
- Used for a purpose other than what it was collected and intended for

This does not overrule a staff member's duty to report child protection concerns to the appropriate channel where staff believe a child has been harmed or is at risk of harm, as detailed further in our child protection and safeguarding policy.

10. Honesty and integrity

Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using school property and facilities. Staff will not accept bribes.

Staff will ensure that all information given to the school is correct. This should include:

- Background information (including any past or current investigations/cautions related to conduct outside of school);
- Qualifications;
- Professional experience.

Where there are any updates to the information provided to the school, the member of staff will advise the school as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.

11. Dress code

All staff in school will dress in a professional, appropriate manner; smart, casual clothing and wearing of sports kit on days when teaching PE is acceptable. Jeans are not permitted.

- Outfits will not be overly revealing.
- Clothes will not display any offensive or political slogans.
- Footwear will meet health and safety requirements

All staff in pre-school are expected to maintain a professional appearance by wearing smart, casual attire that is appropriate for the pre-school setting.

- Smart black trousers or high-quality black leggings are permitted, provided they are not see-through.
- Only black or dark grey denim is acceptable; denim in other colours is not permitted.
- Clothing must not be overly revealing. Tops must cover the shoulders and shorts must be no shorter than just above the knee.
- Attire must be plain and free of any offensive or inappropriate content.
- Footwear must comply with health and safety requirements; beachwear, including flip-flops or slip-on sandals, is not allowed.
- Preschool-branded tops must be worn at all times during working hours.

12. Conduct outside of work

Staff will not act in a way that would bring the school, or the teaching profession, into disrepute. This covers conduct including, but not limited to, relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the school on social media. Any conduct of this nature could lead to disciplinary action.

Whilst recognising that smoking and vaping are lawful activities for adults, staff should be mindful of their role as representatives of the school and the potential impact on pupils and the wider community. Staff should not smoke or vape whilst representing the school, attending school events or in the presence of pupils.

Where staff choose to smoke or vape away from the school site, any uniform, branded clothing, lanyards, identification badges or other items that identify them as employees of the school must not be visible and should be removed, covered or changed as appropriate before doing so. Staff should exercise professional

judgement when smoking or vaping in public places where they may reasonably be recognised as members of the school community and should avoid any conduct that could adversely affect the reputation of the school.

13. Monitoring arrangements

This policy will be reviewed annually but can be revised as needed. It will be approved by the Headteacher, following consultation with the senior leadership team and presented to staff. Our Governing Body will ensure this code of conduct is implemented effectively and will ensure appropriate action is taken in a timely manner to safeguard children and deal with any concerns.

14. Links with other policies

This policy links with our policies on:

- Staff disciplinary procedures, which will be used if staff breach this code of conduct. It also sets out examples of what we will deem as misconduct and gross misconduct;
- Staff grievance procedures;
- Child protection and safeguarding;
- Mobile phone
- Social media
- Online safety