

ST MARGARET'S PREP



ST MARY'S CALNE

& ST MARY'S SPORTS CLUB

### Staff Code of Conduct

Issued by:	SGT
Last review:	September 2024
Next review due:	September 2025
Ratified by Governing Council	Only needed for ISI/KCSIE compliance policies
Circulation:	e.g website, MSP, Teams etc Teams

## STAFF CODE OF CONDUCT

### 1) Introduction

This document provides a guide for staff working in schools (*where “staff” refers to all those working for the school, full time or part time, temporary or permanent, in a paid or regular voluntary capacity*) about acceptable and desirable conduct to protect both adults and pupils. It refers to and complements other policies and guidance in school.

Staff should be familiar with and work in accordance with the school's policies including in particular:

- Child Protection
- Behaviour (including Pupil Code of Conduct)
- Confidentiality
- Online Safety
- Health and Safety
- Trips
- Pastoral Care
- Data Protection Policy
- Whistleblowing
- Expectations of Staff
- Complaints
- Low Level Concerns Guidance
- SEND Policy
- Staff Dress Code Policy

In addition, all staff will have read Part 1 or Annex A of *Keeping Children Safe in Education*, 2024.

This Code of Conduct is provided to all staff, including temporary staff and volunteers, on induction. This policy is based upon *Guidance for safer working practice for those working with children and young people in education settings* (February 2022) and developed in line with KCSIE (Keeping Children Safe in Education September 2024).

Appendix 2 provides guidance to staff who are parents of pupils at St Mary's Calne and St Margaret's Prep.

### 2) Expectations

All staff working at St Mary's and St Margaret's should:

- be familiar with this policy and Wiltshire's child protection procedures and guidance.
- understand their responsibilities to safeguard and promote the welfare of children.
- be aware that failure to meet the Staff Code of Conduct standards may result in disciplinary action.
- know the name of the Designated Safeguarding Lead (DSL) in the relevant school.

Mrs Sophie Toland is the DSL and Mrs Claire Bolton, Mrs Vicky Firth and Mrs Diana Harrison are Deputy DSLs at St Mary's.

At St Margaret's, Mrs Juliette Heal is the DSL and Mr Alex Hopkins is the DDSL.

Mrs Tricia Pearce is the school Nominated Safeguarding Governor.

### **3) Confidentiality**

As part of their responsibilities, staff may be given highly sensitive or private information. The storing and processing of personal information about pupils is governed by the UK GDPR 2018 (General Data Protection Regulations) (see Data Protection Policy). Such information should be kept confidential and shared on a need-to-know basis only. Governors and trustees should not routinely access child records. Exceptions to this would be for the purpose of an investigation in line with the school's complaint policy and procedures

This means staff should:

- Treat information received about pupils and families in a discreet and confidential manner.
- Seek advice from the DSL or Deputy DSL if they are in any doubt about sharing information which they hold, or which has been requested of them.
- be clear about when information can/must be shared and in what circumstances.
- know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported.
- ensure that where personal information is recorded using modern technologies that systems and devices are kept secure.

### **4) Staff Relationships with children and parents**

#### **4.1) Staff responsibilities – staff should know:**

- they are in positions of trust in relation to all children (and pupils over the age of 18) on roll.
- they should behave in a mature, respectful, safe, fair and considered manner.
- they must not use their position to gain access to information for their own advantage and/or a pupil's or family's detriment.
- they must not use their power to intimidate, threaten, coerce or undermine pupils.
- they must be seen to work in an open and transparent way
- they must provide a good example and a positive role model to pupils.
- they must always act and be seen to act, in the child's best interests.
- smoking and vaping on school grounds is illegal
- that they should not consume alcohol when responsible for pupils or enter boarding houses or be around pupils when under the influence of alcohol
- they are responsible for their own actions and behaviour and should avoid any conduct which would lead a reasonable person to question their motivation or intentions, or suitability to care for other people's children.
- how to best build trusted relationships with children and young people which facilitate communication, using professional curiosity and speaking to the DSL if they have any concerns about a child.
- that any conduct or incident which might lead to a change in a DBS (Disclosures and Barring Service) for a member of staff must be reported to the Head.
- At St Mary's, they should inform the member of House staff on duty if they wish to visit a Boarding House by calling the house mobile or speaking to the house duty member of staff

directly. Advance notice of visits may be given through written communication such as visits to Houses organised by Admissions.

- that all work with pupils and parents should be undertaken in school wherever possible. If a home visit is necessary, this should be agreed with a member of the relevant Leadership Team and under agreed risk management strategies, unannounced visits should be avoided wherever possible, **there should be visual access or open doors in one-to-one settings, detailed records including arrival and departure times should be kept and any behaviour which gives rise to concern should be reported.** Permission needs to be given by the Head and logged by the DSL at the relevant school.
- they should apply the same professional standards regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or culture.
- That they are encouraged to self-report Low Level Concerns or breaches relating to the Staff Code of Conduct or the Safeguarding and Child Protection Policy
- that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them. Any member of staff who breaches the law or professional guidelines should inform the school immediately to be seen to be open and transparent. This includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk.

It is an offence (Sexual Offences Act 2003) for a member of staff in a position of trust to engage in any form of sexual activity with a child under the age of 18, or in the presence of that child, or causes or incites that child to engage in or watch sexual activity).

Any relationship formed between an adult and a child or young person with whom they work, regardless of whether the child or young person consents or not, may be regarded as a criminal offence and will always be a matter for disciplinary action.

This means staff should:

- **Not discuss personal or sexual relationships with or in the presence of pupils.** Not discuss sexual matters with or in the presence of pupils, other than in within the agreed content of the curriculum or as part of an agreed job role.
- Be aware that many areas of the curriculum can include or raise subject matter which is sexually explicit or of a political or sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes.
- Take care when encouraging pupils to use self-expression, not to overstep personal and professional boundaries
- Not enter into or encourage inappropriate discussions which may offend or harm others or undermine British values, express prejudicial views or attempt to influence or impose their own personal values, attitudes or beliefs
- **Ensure that any one-to-one situations are made known to other members of the Department and are conducted in an open space, or a room with a visibility panel, or the door is left open.** Avoid the use of 'engaged' signs wherever possible as these suggest secrecy, always report any situation where the pupil becomes distressed or angry and consider the needs and circumstances of the pupil involved
- Not develop 'personal' or sexual relationships with pupils. Staff should not have any form of sexual contact with a pupil from the school or setting and should avoid any form of touch or comment which is, or may be considered to be, indecent. Staff working in Houses should follow guidance from the Housemistress/Master and teaching staff follow departmental guidance also.

- Avoid any form of communication with a pupil which could be interpreted as a sexually suggestive, provocative or give rise to speculation, e.g. verbal comments, notes, emails, social media, texts, physical contact.
- Never make sexual remarks to or about a pupil.

#### **4.2) Communication with children and parents, including social contact**

All staff should ensure that their relationship with pupils remains on a professional footing. For example, they must:

- Not behave in a way that could lead a reasonable observer to question their conduct, intentions or suitability to care for other people's children, e.g. offering lifts to pupils
- **Not make arrangements to contact, communicate or meet with pupils outside their work (this includes use of personal email, text, or any social media platform or other messaging systems)**
- Not give out their personal details to pupils or parents
- Use only equipment and internet services provided by the school
- Not take any photographs, videos or digital recordings of pupils on their personal devices
- Follow the school's Staff IT Code of Conduct
- Ensure that their use of technologies could not bring the school into disrepute.
- Not accept any requests to connect with a pupil at St Mary's or St Margaret's on any social media site. Staff should report any pupils who make requests to the DSL
- Be aware they must wait until an ex-pupil's 21<sup>st</sup> birthday or three years post UVI before accepting any request on social media. The young person should no longer be a pupil at St Mary's.
- Not encourage students to follow or support specific political viewpoints. St Mary's precludes the promotion of partisan political views.

#### **If a pupil or parent seeks to establish social contact, staff must:**

- Refrain from sending personal communication to pupils or parents unless agreed with a member of the relevant Leadership Teams
- Advise Head/DSL of any social contact you have with a pupil (including online contact)
- Inform Head/DSL of any relationship with a parent where this extends beyond the usual parent/professional relationship. See guidelines for staff who are also parents at St Mary's and St Margaret's.
- Inform Head/DSL of any requests or arrangements where parents wish to use your services outside school, e.g. home tutoring, babysitting or if you wish to engage pupils to work in a role such as waitressing or babysitting outside of school.

#### **4.3) Gifts, Rewards and Favouritism**

The school reward system is described in the Behaviour Policy. Staff should behave in a manner such that they do not discriminate favourably or unfavourably toward any child and should:

- Ensure an understanding of the school's relevant policies for example, rewarding positive behaviour.
- Always approve any planned social contact with pupils or parents with a member of the Leadership Team, for example when it is part of a reward scheme and record using the Form found in Staff Resources on Teams.
- Not discriminate favourably or unfavourably towards any child.
- Ensure that gifts received or given in situations which may be misconstrued are declared and recorded. Refer to the Anti-Corruption and Bribery Policy for more details.
- Only give gifts to a pupil as part of an agreed reward system.

- Ensure where giving gifts other than as above, that these are of insignificant value and given to all pupils equally.
- Ensure that all selection processes of pupils are fair and these undertaken and agreed by more than one member of staff.
- Ensure that they do not behave in a manner which is either favourable or unfavourable to individual pupils.
- Never ask pupils to undertake jobs or errands for personal benefit.

Staff at St Mary's may wish to invite groups of pupils to end of year events, meals etc. This is acceptable provided they have due care for this and before doing so should request permission from the Senior Deputy Head, Deputy Head Academic, or Deputy Head Pastoral. This should be logged on CPOMS.

#### **4.4) Infatuations**

- Staff should discuss and/or take advice promptly from the Head/Senior Deputy Head (SMC) about any incident which could give rise to concern.
- They should discuss the circumstances that informed their action with Head at either school or the Senior Deputy Head (SMC) or where appropriate with either school's Designated Safeguarding Lead. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted. This would include reporting infatuations by a pupil for that or another member of staff, to ensure that such situations can be handled promptly and sensitively.
- They should report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff.
- Professional boundaries should always be maintained.
- The Leadership Teams should ensure that action plans are put in place where concerns are brought to their attention. Any misunderstanding, accidents or threats should be discussed with the Head or Designated Safeguarding Lead.
- A record should be kept of any such incident and of decisions made/further actions agreed, with justifications and any areas of disagreement recorded in accordance with school record keeping policy, and if necessary, being referred to another agency/the LA/TRA/other Regulatory Body.

#### **4.5) Appropriate Use of Language**

- Staff should use appropriate language and should not swear, blaspheme or use offensive language, nor use language which is discriminatory and demeaning in any way. Staff should not use language that embarrasses or humiliates children or engage in "banter" with children as outlined by the school's Anti-bullying Policy.

### **5) Use of Personal Living Space – maintaining privacy and professional boundaries**

Staff should not invite any pupil into their home unless the reason for this has been firmly established and agreed with parents/carers and a member of the Leadership Team at St Mary's. This should be logged on CPOMS. This means staff should:

- **Be vigilant in maintaining privacy when living in on-site accommodation and be mindful of the need to avoid placing themselves in vulnerable situations.**
- **Be mindful of the need to maintain appropriate personal and professional boundaries.**

## **6) Dress and Appearance**

Staff should refer to the Staff Dress Code policy for more detailed information, but in summary staff should wear clothing that:

- Promotes a positive and professional image
- Is appropriate to their role
- Is not likely to be viewed as offensive, revealing or sexually provocative
- Does not distract, cause embarrassment or give rise to misunderstanding
- Is absent of any political or otherwise contentious slogans
- Is not considered discriminatory
- Is compliant with the Staff Dress Code policy and professional standards.
- Covers tattoos that may be viewed as offensive, provocative or are likely give rise to misunderstanding. Regardless of this, employees may be asked to cover up visible tattoos and/or body piercings.

## **7) Guidelines on the Use of Physical Contact and Restraint**

### **7.1) Physical contact**

Staff, especially boarding staff, have a responsibility to offer support, encouragement and comfort to pupils. It is inevitable that, on some occasions, especially dealing with younger children who are distressed for some reason, the most appropriate, indeed, the only caring one, involves physical contact. It should be emphasised however, that staff must be sensitive to a child's feelings at all times in offering such comfort; sometimes an arm laid briefly on the shoulder or a fleeting pat on the back may be all that is needed or welcomed. Alternatively, it may be more appropriate to invite some of the pupil's friends to offer comfort and to give verbal support.

It is crucial that in all circumstances, we should only touch pupils in ways which are appropriate to our professional or agreed role and responsibilities. We should behave in a mature, respectful, safe, fair and considered manner and:

- Only touch pupils for professional reasons, and when this is necessary and appropriate to do so for the pupil's wellbeing or safety, following Departmental guidance for subjects such as Music, Sport and Drama where contact may be deemed necessary to support learning (more guidance on this is set out in the *Guidance for Safer Working Practice* referred to above)
- Be aware of cultural or religious views about touching and sensitive to the issues of gender.
- Explain the reason for making physical contact and ask the pupil's permission to do so
- Be aware that even well-intentioned physical contact may be misconstrued by the pupil, an observer or any person to whom this action is described
- Never touch a pupil in a way which may be considered indecent
- Always be prepared to explain actions and accept that all physical contact be opened to scrutiny
- Never indulge in horseplay
- Physical contact must never be secretive or for the gratification of the adult
- Understand that children with disabilities may require more physical contact. The arrangements are understood by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny.
- Always allow/encourage pupils, where able, to undertake self-care tasks independently.
- Understand that a child that has suffered abuse or neglect or has mental health difficulties may associate physical contact with such experiences. They recognise that such a child may seek out inappropriate contact and know to deter the child sensitively

Staff should record incidents on CPOMS.

If a member of staff believes an action by them or a colleague (including supply teachers and volunteers) could be misinterpreted, or if an action is observed which is possibly abusive, the incident and circumstances will be immediately reported to the Head. (Anen Wakefield at SMC and Alex Hopkins at SMP). If appropriate, the Head will consult with the Designated Officer for Allegations (DOFA). Please refer to section 12 for guidance on concerns and allegations against staff, including low level concerns.

Staff should note that corporal punishment is unlawful and is forbidden at St Mary's Calne and St Margaret's Prep.

## **7.2) Restraint**

We also do not expect staff to use physical restraint; instead, staff members are expected to de-escalate the situation where possible.

- If physical restraint is required it must be by a reasonable (using no more force than needed) and non-injurious means and only for the minimum amount of time necessary to prevent injury to self, others or very serious damage to property.
- The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances, e.g. the pupil's behaviour and the level of risk presented at the time of the incident (staff should recognise the additional vulnerability of children with SEN, disabilities or mental health/medical conditions).
- Isolation is not an appropriate form of restraint. Locking pupils in a room for any reason is potentially illegal. Staff, volunteers and contractors should never lock a child in a room.
- Any event of this kind should always be reported immediately to the Head and Leadership Team and be recorded in writing in the red Behavioural Management/Use of Restrictive Physical Intervention book which is held by the Senior Member of Staff on duty at St Mary's.

A member of the Leadership Team at St Mary's is always available and should be contacted in any event on the duty mobile.

## **7.3) Intimate Care**

All children have the right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. Additional vulnerabilities that may arise from a physical disability should be considered with regard to individual teaching and care plans for each child. As with all arrangements for intimate care needs, agreements between the children, their parents and the school must be negotiated, agreed and recorded on CPOMS.

Pupils are entitled to respect and privacy at all times and especially when in a state of undress, including when changing, toileting and showering. However, there needs to be an appropriate level of supervision to safeguard pupils, satisfy health and safety considerations and ensure that bullying and teasing does not occur. This supervision should be appropriate to the needs and age of the children concerned and be sensitive to the potential for embarrassment. Staff therefore need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils.



**This means that staff should:**

- have written care plans in place for any pupil who could be expected to require intimate care, outside of the EYFS
- ensure that pupils are actively consulted about their care plan
- avoid any physical contact when pupils are in a state of undress, unless required to support self-care
- follow additional St Margaret's guidelines for intimate care and ensure two adults are present to safeguard the pupil and the adult concerned
- allow/encourage children to undertake self-care tasks independently
- explain to the child what is going to happen before a care procedure takes place
- consult with colleagues where a variation from an agreed procedure is necessary
- record the justification for any variations to the agreed procedure and share this information with parents
- avoid any visually intrusive behaviour
- announce their intention of entering changing rooms
- consider the supervision needs of the pupils and only remain in the room where their needs require this

**This means that staff should not:**

- change or toilet in the presence or sight of pupils
- shower with pupils
- assist with intimate or personal care which the pupil can undertake independently

**8) Behaviour Management**

- All pupils have the right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour. When dealing with challenging behaviour staff must be aware that, as in all schools, corporal punishment and smacking is unlawful at St Mary's Calne and St Margaret's Prep.
- Must never use force as a form of punishment
- Should diffuse situations before they escalate
- Should be mindful of and sensitive to factors both inside and outside of the school or setting which may have an impact on a pupil's behaviour and should follow the relevant school's Behaviour Policy.

**9) First Aid and Administration of Medication**

Please see Medical policies and documents on Teams for St Mary's and Medication policies and documents on Teams for St Margaret's Prep.

**10) Trips, Outings and Transporting Pupils**

When staff or volunteers are required to transport pupils as part of their work they should plan and agree arrangements in advance with parents/carers and their line managers. Staff should read and refer to the Trips policy and:

- Respond sensitively and flexibly where any concerns arise
- Take into account specific needs of pupils
- Have an appropriate licence/permit for the vehicle

- Ensure they are fit to drive and free from any drugs, alcohol or medicine which is likely to impair judgement or the ability to drive
- Ensure that if they need to be alone with a pupil this is for a minimum of time and is made known to their line manager
- Be aware that the safety of the pupil is their responsibility
- Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures
- Ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety. This includes having valid insurance and MOT and appropriate use of seat belts. All emergency arrangements should be understood.
- If staff are using their own vehicle to escort a pupil for school business, they would complete and provide a 'St Mary's & St Margaret's School Driver's Declaration Form' (and any documents requested in the declaration form) to the Logistics Manager. (Refer to expenses policy for full details).

Staff responsible for educational visits should be familiar with the DofE's advice on Health and Safety: <https://www.gov.uk/government/publications/health-and-safety-advice-for-schools>.

- St Mary's and St Margaret's educational visits' guidance should be followed at all times
- Appropriate risk assessments must be in place prior to any off-site visit taking place
- Must have correct ratios of children/staff
- Any overnight visit will explicitly set out sleeping arrangements and bedrooms must never be shared with pupils
- The role and responsibility of each adult must be clear, whether employed or volunteers, e.g. on/off duty arrangements; expectations about boundaries and interactions with children/young people; expectations around smoking/drinking by adults.

#### **11) Acceptable Use of Technology (including Staff IT Code of Conduct, Online Safety, Photography and Video)**

- Staff must adhere to the following Staff IT Code of Conduct conditions:
  - I understand the school has effective filtering and monitoring systems in place and therefore am aware my use of the school digital technology and communications systems in school, and where appropriate out of school, will be monitored.
  - I will not open any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing malware).
  - I will immediately report any loss, damage or faults involving hardware or software, however this may have happened including through malware.
  - I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
  - I will not disclose my password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
  - I will immediately report any illegal, inappropriate or harmful material or incident I become aware of, to the appropriate person.
  - I will not try to install programs of any type or use any programs that might allow me to bypass the filtering / security systems in place.

- I will ensure that I have permission to use the original work of others in my own work and where work is protected by copyright, I will not download or distribute copies (including music and videos).
  - I will raise concerns regarding other staff misuse of technology (in or out of school) using the school's concerns and allegations against adults procedure.
- Staff must adhere to the Data Protection policy.
  - Staff must be aware and have an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring.
  - Staff must abide by St Mary's Online Safety policy at all times, must ensure that pupils are never exposed to indecent or inappropriate images and ensure that films or material shown to pupils are age appropriate.
  - When the school is required to operate in a remote model, teachers are reminded that:
    - Normal business continues, albeit through a virtual medium, and staff should adhere to the staff code of conduct and all existing policies written to ensure safeguarding continues to be effective.
    - Teachers should continue to utilise school systems for all processes including delivery of lessons, registration and communicating with students.
  - Photographs of pupils at St Mary's and St Margaret's may be taken for commercial purposes; to showcase children's talents and achievements and document the life of the school.
  - Images should only be taken on school equipment and stored appropriately and retained only when there is a clear purpose for doing so.
  - Staff should not take photos for their personal use, take images on personal equipment, take images of pupils in a state of undress or semi undress or take images which could be considered indecent or sexual.
  - Staff must not take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) or make audio recordings of a child's disclosure.
  - Staff should not give pupils or parents their personal mobile numbers or email addresses. All communications should take place through school devices or approved channels such as Teams.
  - Staff are encouraged to use generative AI software for the purpose of improving productivity but with the following caveats:
    - Staff must ensure the highest standards of data security when working with any generative AI software. Staff must assume that any data entered would be permanently stored in the system and could be viewed by a third party at a later date.
    - Staff are reminded that 'hallucinations' (false information) are common when working with generative AI and that any output from the software should be verified.
    - Staff should not use generative AI to create parent-facing content.
    - Staff should be cautious about the validity or hidden bias within generative AI output if being used to assist with decision-making.

Please refer to the Data Protection policy and Online Safety policy for more detail.

## **12) Concerns and allegations against staff (including supply teachers, volunteers and contractors)**

Staff are advised to maintain an attitude of 'it could happen here' as far as safeguarding is concerned. When concerned about the Welfare of a child, staff members should always act in the interests of the child. If a member of staff is concerned about the behaviour of a member of staff, (or volunteer, contractor, governor, supply staff or any adult working at the school), they will follow

the “allegations against adults” flowchart (see Child Protection Policy and staff room safeguarding board at St Mary’s and work room safeguarding board at St Margaret’s).

Both schools operate a “low-level” concerns policy in accordance with KCSIE 2024. “Low-level” refers to behaviour that is: inconsistent with expectations set out in this policy, including inappropriate conduct outside of work and /or does not meet the allegation threshold, or is otherwise not considered serious enough to consider a referral to the DOFA.

All concerns, no matter how small, will be shared responsibly and with the right person, recorded and dealt with promptly and appropriately. This will serve our commitment to embed a culture of openness, trust and transparency in which the school’s values and expected behaviour set out in the policy are constantly lived, monitored and reinforced by all staff.

‘Low-level’ concerns could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Please see appendix 1 for Low Level Concerns Guidance and reporting template.

We also encourage all staff to self-refer to their DSL where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

### **13) Whistleblowing**

All staff and volunteers are expected and encouraged to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime (or whistleblowing). Please refer to the school’s Whistleblowing Policy on Teams. Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with: the Head or Senior Deputy Head of St Mary’s, the Head of Prep School at St Margaret’s, or the Bursar.

Where a staff member feels unable to raise an issue with those identified above or feels that their genuine concerns are not being addressed, they have a right to raise it in confidence with the Governors.

In addition, the [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/what-you-can-do/report-abuse/) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Visit <https://www.nspcc.org.uk/what-you-can-do/report-abuse/> to report abuse using an online form. Staff can also call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday or Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

#### **14) As a general principle**

When thinking about taking any course of action with a pupil or other child, staff should ask themselves the following questions:

- Is it in the best interests of the child?
- Is this needed to meet the pupil's needs?
- Is there a professional reason for me to do it?
- Can I do it in a way which is safe for both the child and for me?

Only if the answer to all four questions is YES should the adult take the course of action.

#### **Reference documents**

- *Keeping Children Safe in Education, 2024*
- Wiltshire's Safeguarding Vulnerable People Partnership procedures
- *Guidance for safer working practice for those working with children and young people in education settings (February 2022)*

Reviewed by SLT:	SGT November 2018, January 2019, September 2019, February 2020, September 2020, April 2021 (amended June 2021 following Governor review), September 2021, September 2022, September 2023. October 2023, January 2024, September 2024 (SMC and SMP)
Date of SLT Review:	
Reviewed by Governors:	November 2023

## Appendix 1



### St Mary's Calne and St Margaret's Prep - Low Level Concerns Guidance

#### Low Level Concerns

Both schools operate a 'low-level' concerns policy in accordance with KCSIE 2024. 'Low level' refers to behaviour that is: inconsistent with expectations set out in the Staff Code of Conduct, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the DOfA. (Designated Officer for Allegations.)

All low-level concerns will be reported to the Head at the relevant school, or in their absence, the Designated Safeguarding Lead (DSL); low-level concerns about the Head will be reported to the chair of governors.

Examples of low-level concerns:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door that does not have a glass panel/ visibility; or
- humiliating pupils.

#### The schools will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Code of Conduct) and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- encourage staff to share any low-level safeguarding concerns.
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and supporting the individual to correct it at an early stage. When a concern has been raised via a third party, the Head or DSL will collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously to the individual involved and any witnesses.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

## Clarity around Allegation vs Low Level Concern vs Appropriate Conduct

<b>Allegation</b> Behaviour that indicates that an adult who works with children has: <ul style="list-style-type: none"><li>• behaved in a way that has harmed a child;</li><li>• possibly committed an offence against or related to a child;</li><li>• behaved towards a child or children in a way that indicates they may pose a risk of harm to children</li></ul>
<b>Low Level Concern</b> Any concern -no matter how small, even if no more than a nagging doubt- that an adult may have acted in a manner which: <ul style="list-style-type: none"><li>• is not consistent with the Staff Code of conduct</li><li>• relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's ability to work with children.</li></ul>
<b>Appropriate Conduct</b> Behaviour that is entirely consistent with the Staff Code of Conduct and the law.

### Storing and use of Low-Level Concerns and follow-up information

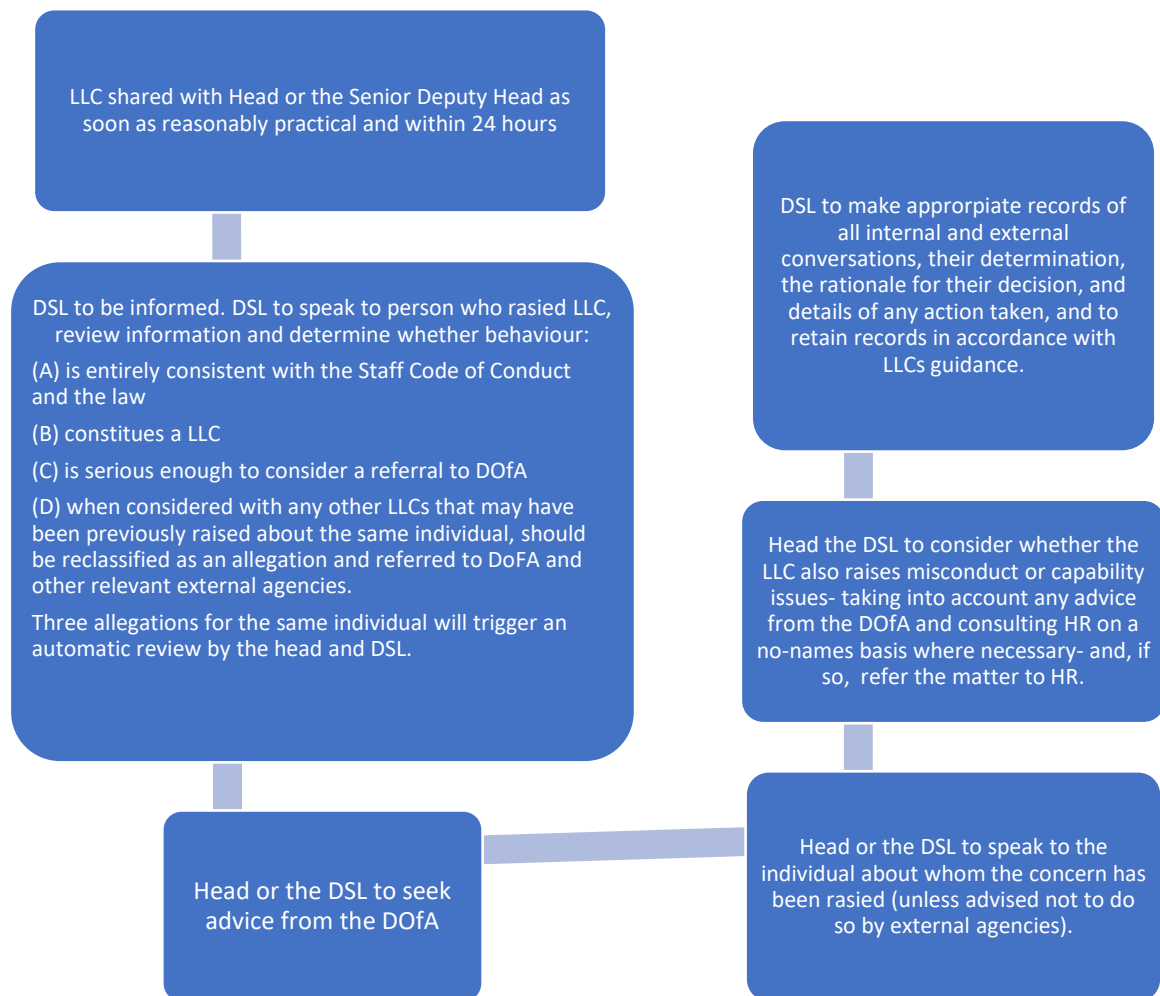
All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Low-level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Low-level concerns and follow-up information will be stored securely within the schools' safeguarding systems, with access only through the Head and DSL. This will be stored in accordance with the School's UK GDPR and data protection policies. Any staff member(s) reporting a concern must keep the information confidential and not share the concern with others apart from the Head or DSL.

Whenever staff leave either school, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to: (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

### Sharing Low-Level Concerns (LLC)

## Action Required







Name of person making the report	
Role	
Date and time	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	
Role	
Relationship to the individual reporting e.g. line manager	
Details of Low-Level Concern	
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</p>	
Details of children or young people involved	
Name (s)	

## Appendix 2

### Low level Concerns Reporting Form

Actions taken and follow-up		
Date	Action	Staff responsible

#### Guidance for Staff who are Parents

Staff whose children attend the School will be in situations where the normal Code of Conduct is not easily applicable. Therefore, this additional guidance is given.

##### Emailing staff

Staff should be mindful of the fact that parents do not have access to their child's teachers in a way that a member of staff does. Therefore, where possible, communication about their child should follow the channels available to other parents e.g., emailing the class teacher, tutor or Housemistress or master. Some staff may choose for their partner to deal with all correspondence with the school or to only use their home email when contacting school, but this is not mandatory. An initial meeting with your child's class teacher, tutor and/or Housemistress or master about how you will be communicating with them and how they should communicate with you should be organised so that no misunderstandings arise, and no communication is missed.

##### Parent/pupil contacts

It is recognised that staff who are parents will have bona fide social contact with parents and pupils out of school. At all times, staff should remember that they are representing the school and behave appropriately. Staff should be careful when giving their personal contact details out to parents as these can be used inappropriately by other parents including telephone calls at unsocial hours about School related matters.

If a member of staff has any contact with pupils outside school e.g., they belong to the same sports' club or church, the DSL should be informed via the form available in the Staffroom area on Teams. Staff should still adhere to normal safeguarding rules and not engage with pupils on anything other School platforms i.e., email and/or Teams.

If a member of staff is giving a pupil who is not their child a lift, then the DSL should be informed regardless to whether it occurs during term time or the holiday. This can be done retrospectively if necessary. If there is a child who is regularly given a lift, then the DSL need only be contacted the first time and the regularity explained e.g., lift to Brownies each week. There is a form available for this purpose in the Staffroom area on Teams.

### Photos

Staff are allowed to take photographs of their child at school events if the event is open to parents e.g., sports' matches. If additional pupils are present in the photograph, as long as it is clear that the staff child was the subject of the photograph, then this may be held on the staff member's personal device. Photographs should not be taken at events not open to parents e.g., Company Shout.

### Parties

Staff children may attend parties given by other families; however, staff have a duty of care to report any safeguarding concerns regarding the party to the DSL. Staff who are hosting a party should seek guidance from the DSL.

### Internal Data

In order to protect the confidentiality of the pupils, members of staff will not have access to the CPOMS entries for their children.