



## Staff Code of Conduct (including whistleblowing procedures, confidentiality, and how to report low level concerns)

**Date of Document: September 2025**

**Review Date: by September 2026**

### Purpose and principles

This Code of Conduct aims to establish a set of principles which underpin the expected conduct of staff at Vernham Dean Gillum's CE Primary School. Its intention is to encourage staff to achieve the highest standards of conduct at work, fostering a **safe and trusting environment for pupils**, and to minimise the risk of improper conduct occurring.

The school requires that all staff have read and comply with the Code of Conduct. Where clarification is needed on any aspect of this document, this should be sought from the Executive Headteacher. Breach or failure to observe the provisions of this document may lead to action being taken under the school's disciplinary procedure. The Code of Conduct is not exhaustive in defining acceptable and unacceptable standards of conduct and behaviour, and in circumstances where guidance does not exist, individuals are expected to use their professional judgement and act in the best interests of the school and its pupils.

Any links within this document to other documents are for ease of use. Staff are expected to familiarise themselves with and adhere to the policies and procedures outlined in those linked documents as they relate to their professional conduct.

### Scope

The Code of Conduct applies to:

1. all members of staff, including teaching and support staff;
2. volunteers, including Governors;
  - a. casual workers;
  - b. temporary and supply staff, either from agencies or engaged directly;
  - c. student placements, including those undertaking initial teacher training, and apprentices.
3. References to 'staff' throughout the Code of Conduct refer to all of the above groups.

### Professional standards at work

1. Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. The school expects staff to treat each other, pupils, parents and the wider community with dignity and respect at all times.
2. Furthermore, staff must have regard for the ethos and values of the school as well as its policies and procedures and act in accordance with these at all times, including in their dealings with those who come into contact with the school e.g. visitors.
3. Staff must act in accordance with their duty of care to pupils and ensure that the safety and welfare of the children and young people at the school are accorded the highest priority. In this and other ways staff should always maintain standards of conduct and behaviour which sustain their professional standing and that of the school.
4. Teachers are reminded of, and are expected to uphold, their wider responsibilities as set out in the [Teachers' Standards](#), including an understanding of, and acting within, the statutory frameworks which set out their professional duties and responsibilities.

### Absence

1. Staff are expected to maintain good attendance and punctuality. In the event of absence, whether due to illness or other reasons, staff have a professional responsibility to follow the school's established absence reporting

procedures promptly. This ensures that appropriate cover can be arranged, minimizing disruption to pupils' learning and the smooth operation of the school. All staff must be familiar with and adhere to the detailed requirements outlined in the school's **Absence Management Policy**, which provides full guidance on reporting procedures, certification, and expectations during periods of absence.

## Safeguarding

1. **Vernham Dean Gillum's CE Primary School** recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities. Staff must be aware of their individual safeguarding responsibilities, including to provide a safe environment in which children can learn, to be aware of the signs of abuse and neglect, to identify children who are suffering, or are likely to suffer, significant harm (as defined in Appendix 1) and to take appropriate action in such cases to prevent concerns from escalating.
2. All members of staff must be aware of the school's systems for supporting child safeguarding, including the role of the school's Designated Safeguarding Leads (DSLs).
3. The DSLs are
  - a. **Holly Bulpitt (Head of School)**
  - b. **Ian Hickman (Executive Headteacher)**
  - c. **Helen Silver (SENCo)**
  - d. **Flo Nicoll (ELSA)**
4. Concerns about the welfare of a child must be raised without delay to the school DSLs in the first instance or to their Deputy if the DSL cannot be located. In the event that none of the above are available **contact Hampshire County Council's Safeguarding team (01962 876364)**. There should be no delay in reporting a concern if there is risk of immediate serious harm to a child.
5. Staff should be familiar with the school's child protection policy, All staff will receive appropriate child protection training and will be provided with guidance on child safeguarding as part of their induction.
6. In accordance with the statutory guidance published by the Department for Education '[Keeping Children Safe in Education](#)', all staff at **Vernham Dean Gillum's CE Primary School** are required to read Part One. The full document is available via the above link or via the shared [Google Drive](#)

## Appropriate relationships

1. **Pupils**
  - a. Individuals who work or volunteer in a school environment are in a position of trust. Staff should be mindful of the need to maintain professional boundaries appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably.
  - b. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.
  - c. Staff must avoid unnecessary physical contact with children. Where physical contact is essential, e.g. for safety reasons, the pupil's permission must be gained for that contact wherever possible. If physical contact is made to remove a pupil from a dangerous situation or an object from a pupil to prevent either harm to themselves or others, then this should be recorded and reported to **the Executive Headteacher**. In cases where accidental physical contact was made, it should be reported to **the Executive Headteacher**. In all cases staff should act in accordance with the school's restraint policy.
2. **Parents**
  - a. Staff are expected to interact with parents in a polite and respectful manner and recognise parents' entitlement to express any concerns they may have about their child's learning, safety or wellbeing. Staff should avoid discussing school matters with parents outside school if approached and should instead refer the parent to the normal communication channels.

## Acceptable use of technologies (including use of mobile devices)

1. Staff must appreciate that ICT includes a wide range of systems, including mobile phones, personal digital assistants, cameras, email, internet and HCC intranet access and use of social networking and that ICT use may also include personal ICT devices when used for school business.
2. Staff must understand that it may be a criminal offence to use the school ICT system for a purpose not permitted.
3. Staff must not communicate information which is confidential to the school or which they do not have the authority to share.
4. Staff must understand that school information systems and hardware may not be used for personal or private use without the permission of the Executive Headteacher.
5. Staff must understand that their use of school information systems, internet and email may be monitored and recorded, subject to the safeguards outlined in the policy to ensure policy compliance.
6. Staff must understand the level of authority required to communicate with parents and pupils using the various methods of communication.
7. Staff must not use the school ICT system to access inappropriate content.
8. Staff must understand that accessing, viewing, communicating and downloading material which is pornographic, offensive, defamatory, derogatory, harassing or bullying is inappropriate use of ICT and could result in disciplinary action.
9. Staff must respect system security and must not disclose any password or security information to anyone other than an authorised system manager or use anyone's account.
10. Staff must not install any software or hardware without permission.
11. *Staff must ensure that personal data is stored securely and is used appropriately whether in school, taken off the school premises or accessed remotely. They must not routinely keep personal data on removable storage devices. Where personal data is required, it will be password protected/encrypted and removed after use. Staff must respect copyright, intellectual property, and data protection rights in accordance with the UK GDPR and the Data Protection Act 2018.*
12. Internet use for personal financial gain, gambling, political activity, advertising or illegal purposes is not permitted.
13. Staff must report any incidences of concern regarding children's safety to the Designated Safeguarding Lead or Headteacher.
14. Staff must report any incidents of inappropriate use or abuse of ICT and inappropriate electronic communications, whether by pupils or colleagues, to the Headteacher, or if appropriate, the Chair of Governors.
15. Staff must ensure that any electronic communication undertaken on behalf of the school, including email and instant messaging are compatible with their professional role and that messages do not present personal views or opinions and cannot be misunderstood or misinterpreted.
16. Staff must ensure that any electronic communications with pupils, where permitted, are compatible with their professional role and that messages cannot be misunderstood or misinterpreted.
17. Teachers must promote e-safety with pupils in their care and help them to develop a responsible attitude to system use, communication and publishing.
18. Staff must understand that inappropriate use of personal and other non-school based ICT facilities can have implications for their employment at the school where this becomes known and where activities undertaken are inconsistent with expectations of staff working with children.

### **Use of Social Media**

1. Staff must understand the school's stance on use of social networking and given their professional role working with children, must exercise care in any personal use of social networking sites.
2. The school recognises an employee's right to a private life. However the school must also ensure its reputation and confidentiality are protected. Therefore an employee using any ICT away from school, including email and social networking sites must:
  - a. refrain from identifying themselves as working for the school in a way that could have the effect of bringing the school into disrepute
  - b. not express a personal view as a school employee that the school would not want to be associated with
  - c. notify the Senior Leadership Team immediately if they consider that content posted via any information and communications technology, including emails or social networking sites, conflicts with their role in the school
  - d. not have any unauthorised contact or accept 'friend' requests through social media with any pupil/student unless they are family members;

- e. exercise caution when having contact or accepting 'friend' requests through social media with parents so as not to compromise the school's reputation or school information;
  - f. not allow interaction through information and communications technology, including emails or social networking sites, to damage relationships with work colleagues in the school and/or partner organisations, pupils/students or parents
  - g. not disclose any data or information about the school, colleagues in the school and/or partner organisations, pupils/students or parents that could breach the UK GDPR and the Data Protection Act 2018
  - h. not use the Internet or social media in or outside of work to bully or harass
3. School staff must never give out personal details of others, such as home address and telephone numbers. Staff must handle all personal or sensitive information in line with the school's Data Protection Policies.
  4. With the rise in identity theft and fraud, staff may wish to consider the amount of personal information that they display on personal profiles.

### Use of personal devices

1. Vernham Dean Gillum's CE Primary School recognises the wide range of personal electronic devices that many people own, including members of staff.
2. Mobile phones, smart watches, fitness trackers and other such devices are commonplace in society and in the workplace.
3. All staff should recognise the unique nature of the work they do with children and as such, use of personal devices must be kept to a minimum during working hours.
4. Phones and other devices that receive notifications should be kept on silent during the working day.
5. Staff may want to check their notifications and messages during the day, but this should be kept to breacktimes and lunchtimes or other 'non-contact' time (e.g. PPA).
6. Personal smart devices must not be used to take photographs, videos or sound recordings except for clearly defined purposes and only then with the express permission of the Executive Headteacher. Photos or recordings taken under these circumstances must be transferred to the school's storage systems and deleted from the personal device they were taken on and any associated storage as soon as possible.

### Confidentiality and disclosure of information

1. *Staff must ensure that they do not disclose confidential information to anyone who does not have the right to receive it. Where information is disclosed, this should be in line with the principles of the **UK GDPR and the Data Protection Act 2018**. Equally, staff should not prevent another person from gaining access to information to which that person is entitled by law. If there is doubt about whether or not to share information, advice must be sought from an appropriate senior member of staff.*
2. Information obtained during the course of an individual's work should never be used for personal gain or benefit, nor should it be passed onto others who might use it in such a way.
3. Appendix 3 gives examples of what a breach of confidentiality might look like.

### Dress and appearance

1. An individual's dress and appearance is a matter of personal choice; however, staff should ensure that they dress professionally, appropriately, decently, and safely for a school environment. **Their attire should reflect the high standards of the school, contribute to a positive professional image, and serve as a suitable example for pupils.**
2. Staff should have particular regard to the health and safety risks involved with certain lessons (e.g., physical education/food technology) and the need to dress appropriately and safely when undertaking these activities, such as wearing appropriate footwear, tying back long hair, or removing jewellery.
3. The school recognises the diversity of cultures and religions of its staff and will take a sensitive approach when this affects dress and uniform requirements. However, priority will always be given to health and safety, security, and the overall professional and educational considerations for other staff, pupils, and the school.
4. **To maintain a consistent professional standard and ensure safety, the following items are not normally considered appropriate for school and should not be worn:**
  - a. **Denim (in any colour)**
  - o **Flip-flops**

- Ugg Boots
  - Crocs
  - Clothing with offensive or inappropriate slogans/graphics
  - Excessively revealing clothing (e.g., very short skirts/shorts, low-cut tops, bare midriffs)
  - Activewear/gym clothing (unless specifically required for a PE lesson or activity)
  - Tracksuits (unless specifically for a sporting event)
  - Where activewear/gym clothing is worn, it should be plain, smart and professional, e.g black/navy/grey leggings, school polo shirt.
5. Adherence to this dress code is considered part of maintaining professional standards under this Code of Conduct. Persistent or significant non-compliance may lead to action being taken under the school's disciplinary procedure.

### Equal opportunities

1. The Governing Body of the school is committed to equality for all in the appointment, development, training and promotion of staff, and in all dealings with pupils and parents of the school. It also recognises that all members of staff have the right to work in a safe environment without fear of discrimination, harassment or abuse.
2. All pupils, colleagues, parents, members of the public and wider community have the right to be treated with fairness and equality and must not be discriminated against. The school expects staff to uphold these principles.

### Conduct outside work

1. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside school and responsibilities within school. In no case should outside activities bring the school into disrepute.

### Declaration of interests

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

### Whistleblowing

1. Whistleblowing is a term used when staff need to report a **serious concern about malpractice or wrongdoing within the organisation that is in the public interest**. This may include situations where normal reporting systems are unsuitable, or the concern involves a manager or senior person.
3. This Policy has been designed to operate in accordance with the provisions of the **Public Interest Disclosure Act 1998**, which gives protection to people who disclose reasonable concerns about serious misconduct or malpractice at work.
4. At Vernham Dean Gillum's CE Primary School, the Executive Headteacher, Ian Hickman, is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should **immediately report your concern to the school's Designated Safeguarding Lead (DSL) or Executive Headteacher**.
5. The Policy applies to all staff in the school and is intended to encourage staff to raise concerns within the school as a first priority, rather than make a wider disclosure outside of the school.
6. The Governing body of the school will treat all matters of malpractice very seriously and responsible allegations about such matters will be dealt with quickly, seriously and with appropriate confidentiality.
7. In order to meet the requirements of the Act, in addition to school staff, the procedure is applicable to agency staff, students on placements, supply staff, volunteers, contractors and suppliers operating under contract to the school. The term "employees" in this Policy is intended to cover all of these categories of people.
8. This Policy should not be confused with other existing procedures such as the individual or collective grievance procedures that exist to enable employees to raise concerns about their own employment. It is designed to deal

with major issues that fall outside of the scope of those procedures. Therefore, any matter which is more appropriately covered by those procedures is excluded from being considered under the Whistle Blowing Policy.

9. Examples of the type of issue that would fall within the scope of this Policy are:
  - a. Conduct which is a criminal offence or a breach of the law
  - b. Sexual or physical abuse of pupils or others
  - c. Major health and safety risks – to staff or members of the public
  - d. Fraud and/or corruption
  - e. Other unethical conduct of a serious nature
10. The Act also covers issues relating to miscarriage of justice and environmental damage.
11. The Policy gives protection to employees who, in good faith, make such a disclosure, from victimisation, discrimination or disadvantage. It also ensures employees receive an appropriate response to their disclosure and are aware of how they may pursue the matter outside of the County Council if this response is not satisfactory. It is acknowledged that there are some circumstances in which there may be a statutory requirement to report information to an external agency, such as the police.
12. Disclosures made under this Policy are likely to be of a sensitive nature and all parties should preserve confidentiality at all times.
13. Staff should acknowledge their individual responsibilities in bringing matters of concern to the attention of senior leadership in the school. This is particularly important where the welfare of children may be at risk.
14. **Representation**
  - a. Employees are entitled to representation by a professional association/ trade union representative or a 'friend', who will normally be another employee, at any meetings or interviews that are held in relation to the disclosure made. Employees should specify that they are making a disclosure under this Policy.
  - b. The individual manager hearing the disclosure is encouraged to take advice from Education Personnel Services who may involve other departments of the County Council where appropriate.
15. **Time limits**
  - a. There are no time limits on raising concerns under this Policy, but they should be raised at the earliest practicable opportunity, since delays in making a disclosure may prevent a full investigation from taking place. Where time limits are included within this Policy, they are there to ensure that disclosures are dealt with as quickly as possible, and to ensure that there is a prompt initial response from management.
  - b. The investigation that takes place after a disclosure is made is not time limited, but will be conducted as quickly as possible within the circumstances of the disclosure.
16. **Untrue allegations**
  - a. If an allegation is found to be untrue, but the employee has made the allegation in good faith, no action will be taken against the employee. However, employees who make allegations maliciously, frivolously or for personal gain may face disciplinary action.
17. **Raising a concern**
  - a. In the first instance, concerns should be raised with the Head of School or Executive Headteacher, If the employee's concern relates to the Executive Headteacher, they should contact the Chair of Governors.
  - b. Within ten working days of a concern being raised, the person hearing the concern will write to the employee to acknowledge that the concern has been received. They should also indicate what initial steps they intend to take to deal with the matter and, where possible, provide an estimate of the time it will take to provide a final response.
  - c. Concerns may be raised orally or in writing, although written submissions are preferred wherever possible. These disclosures should provide as much information as possible about the matter, including dates, individuals involved, other possible sources of information, etc. Employees must be able to demonstrate to the person hearing the disclosure that there are reasonable grounds for making the allegations.
  - d. Although employees who wish to make an anonymous disclosure may do so, it may be important for the investigating manager to know the source of the information for a full and appropriate investigation to be possible. The manager will need to take into account the nature and credibility of an allegation before deciding whether to proceed with an investigation. However, employees should be re-assured that all disclosures will be treated in confidence and every effort will be made to preserve anonymity.

The Act provides protection against victimisation of anyone who makes a protected disclosure in good faith.

- e. The Executive Headteacher or Head of School will take the following steps:
- i. **Acknowledge and Listen:**
    1. **Take the concern seriously:** Reassure the whistleblower that their concerns are important and will be treated seriously.
    2. **Listen actively:** Provide a safe and confidential space for the whistleblower to share their concerns without interruption.
    3. **Document the concern:** Take detailed notes of the conversation, including the specific nature of the concern, the date, and any supporting evidence.
  - ii. **Assess the Situation:**
    1. **Determine the seriousness of the concern:** Evaluate the potential impact of the issue on the organization, employees, and stakeholders.
    2. **Assess the credibility of the whistleblower:** Consider their position, knowledge, and any potential biases.
    3. **Determine the appropriate course of action:** Decide whether to investigate the matter internally or involve external authorities.
  - iii. **Investigate Thoroughly:**
    1. **conduct a full, fair and impartial investigation:** Gather evidence from various sources, including interviews with witnesses, documents, and other relevant materials.
    2. **Maintain confidentiality:** Protect the identity of the whistleblower and any other individuals involved in the investigation.
    3. **Document all findings:** Keep detailed records of the investigation process, including interviews, evidence collected, and conclusions.
  - iv. **Take Appropriate Action:**
    1. **Address the underlying issue:** Implement corrective actions to address the root cause of the concern and prevent similar issues from occurring in the future.
    2. **Communicate the outcome:** Inform the whistleblower of the investigation findings and the actions taken to address the concern.
    3. **Protect the whistleblower:** Take steps to protect the whistleblower from retaliation and ensure their continued employment.
    4. **Escalate matters:** Inform the governing body and if necessary escalate to EPS and other relevant agencies (e.g. LADO, Police).
  - v. **Review and Improve:**
    1. **Evaluate the effectiveness of the response:** Assess whether the actions taken adequately addressed the concern and protected the whistleblower.
    2. **Review and update whistleblower protection policies:** Ensure that the organization's policies and procedures are up-to-date and effectively protect whistleblowers.
    3. **Provide ongoing training:** Educate managers and employees on the importance of whistleblower protection and how to handle concerns appropriately.

## 18. Taking the matter further

- a. In the event that an employee feels that their concerns have not been resolved through the above process, they may write to the Chair of the Governing Body, if he/she has not already been involved, outlining their concern, the action taken to date and the reasons for their dissatisfaction.
- b. Within 10 working days of a concern being raised, the Chair of Governors will write to the employee to acknowledge that the concern has been received and indicate what steps will be taken to deal with the matter, as well as providing an estimate of the time it will take to provide a final response. The Chair of Governors may decide to set up a small group of governors, where appropriate, to investigate the concerns. The Chair of Governors will then inform the employee of the outcome of this process on the same basis as required of the manager above.
- c. In the event that the matter cannot be satisfactorily resolved within the school, the employee may raise their concerns, in writing, within the County Council's Children's Services Department, in the following order:

- i. with the Local Authority Designated Officer
  - ii. with the Area Director
  - iii. with the Director of Children's Services
  - iv. with the Chief Executive
- d. These officers will follow the same basic procedure outlined above in the same timescales and will feed back the outcome to the individual employee.
- 19. Action and support outside of the County Council**
- a. If an employee is dissatisfied with the response of the Governing Body and the County Council, and subject to the concern being a matter covered by the Act, he /she can raise the matter, as appropriate, with one of the following agencies:
    - i. An elected Member of the County Council
    - ii. A local Member of Parliament
    - iii. The Police
    - iv. Public Concern at Work (0207 4046609)
    - v. A relevant professional body or inspectorate
    - vi. Local Government Ombudsman
    - vii. Diocesan Director of Education
  - b. In taking their concern outside of the County Council, employees must ensure that, as far as possible, the matter is raised without personal information relating to other employees being disclosed.
  - c. An employee who approaches an accredited legal advice centre, e.g. Public Concern at Work or Citizens Advice Bureau, does not breach the duty of confidence in this process to the governing body or the County Council.
- 20. Failure to follow this Policy**
- a. Any employee who unreasonably and without justification raises such issues on a wider basis, such as with the press, without following the steps and advice in this Policy may be liable to disciplinary action.

#### **Health and safety**

1. Staff must adhere to the school's Health and Safety policy and should ensure that they take every action to keep themselves and others in the school environment safe.
2. Please refer to the school's Health and Safety policy for further information.

#### **Gifts and hospitality**

1. There may be occasions where children or parents wish to pass small tokens of appreciation to staff, for example as an end of year 'thank-you', and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value or to suggest to pupils that gifts would be appropriate or desired. Money should never be accepted as a gift.
2. Staff should not solicit or accept any gift, hospitality or other reward from external parties which influences the way in which they carry out their duties or leads the giver to expect preferential treatment.

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

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

# Appendix 1: Low Level Concerns Policy and Procedure for Reporting

## Policy statement

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.

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

## Scope

This is for all staff working in this school, which includes:

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

The term 'staff' throughout this policy refers to all of the above.

## Policy aims

- To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.
- To enable our school to identify concerning, problematic or inappropriate behaviour early.
- To minimise the risk of abuse occurring.
- To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.

## What is a low-level concern?

- '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 may have acted in a way that: is inconsistent with the staff code of conduct, including inappropriate conduct outside of work that doesn't meet the **harm threshold** or is not considered serious enough for the school to refer to the local authority."
- **The 'harm threshold' refers to behaviour that has harmed a child, may have harmed a child, constitutes a criminal offence against a child, or indicates that a person may pose a risk of harm to children.**

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults 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
- using inappropriate sexualised, intimidating or offensive language.

## Why do schools need to respond to low-level concerns?

Having clear procedures for responding to low-level concerns is part of creating a culture of openness and trust. It helps ensure that adults consistently model values and helps keep children safe. It will also protect adults working in school from potential false allegations or misunderstandings.

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

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

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

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

Low level concerns about a member of staff should be reported to the DSL and/or Executive Headteacher. If the concern is about the Executive 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**

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

Allegations that meet the harm threshold will be referred to the LADO for advice. Low level concerns that the school feels may need further guidance on will be referred to the **Local Authority Designated Officer (LADO)**.

The school will engage with its HR provider (Education Personnel Services) 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 Executive Headteacher (or Chair of Governors if the concern is about the Executive 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 possible).

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.

### **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 Executive 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.

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 normally be included in a reference, unless advised otherwise (e.g. by the LADO/Education Personnel).

## Appendix 2: Allegations against adults who work with children

Working Together to Safeguard Children (2023) states that organisations should have clear policies for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice. Allegations as defined by KCSiE should be reported to the LADO. Complaints or concerns can be managed independently by the school under internal procedures.

Complaints could include: -

- Breaches of the code of Conduct
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns could include:

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.
- Lower Level Concerns LLC's, which do not reach the allegations harm threshold (or complaints criteria), should be dealt with under a school LLC procedure.

### Procedure for Allegations that meet the harm threshold.

This procedure should be used in all cases when it is alleged a member of staff, supply staff, volunteer, Governor, or another adult who works with children has either:

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

When considering allegations of suitability, (the fourth criteria above) the LADOs would consider the following situations:

- Parents of children who are placed on a CIN plan or are receiving Early Help;

- Arrests for offences against adults
- Presentation to other professionals around mental health, domestic abuse and/or substance misuse;
- Extreme political or religious viewpoints which could be considered Hate Crime;
- Concerns about behaviour in their private lives which may impact on children

In any of these situations the LADO criteria for intervention will be assessed against the likelihood and impact of transferable risk to children.

In line with our referral process:

- Staff will report any concerns about the conduct of any member of staff, supply staff or volunteer to the Executive Headteacher as soon as possible.
- If an allegation is made against the Executive Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.
- There may be situations when the Executive Headteacher or Chair of Governors will want to involve the police immediately, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Executive Headteacher or Chair of Governors, they will contact the LADO on 01962 876364 or [child.protection@hants.gov.uk](mailto:child.protection@hants.gov.uk) as soon as possible and before carrying out any investigation into the allegation.
- Inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, we will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police.

When receiving information from outside agencies about school staff, the LADO will assess the potential for transferable risk, and make a disclosure to the school where there is the likelihood of transferable risk to children and there is a pressing need.

If the matter is investigated internally, the LADO will advise us to seek guidance from their personnel/HR provider in following procedures set out in chapter 4 of '[Keeping Children Safe in Education](#)' (2022) and the HSCP procedures.

### Supply Staff

While supply staff are not employees of the school, it is still required that the school report the allegation to the LADO. If the matter requires an internal investigation, this will be carried out by the school in liaison with an HR rep (acting as the employer) from the supply agency.

## Appendix 3: Examples of breaches of confidentiality

These are generally clear violations where sensitive information is deliberately or carelessly disclosed to unauthorised individuals.

1. **Discussing a pupil's sensitive personal information outside of school:**
  - **Example:** A teacher tells their spouse or friend about a pupil's challenging home life, specific learning difficulties, or behavioural issues, using enough detail that the pupil could be identified.
  - **Example:** A staff member discusses organisational decisions with other colleagues who are not involved or with people outside the school – e.g. allocation of staff to specific classes, allocation of responsibilities to each staff member, budget / financial information.
2. **Sharing confidential staff information:**
  - **Example:** A staff member discusses another colleague's disciplinary proceedings, salary, health issues, or personal grievances with other colleagues who are not involved, or with people outside the school.
3. **Leaving sensitive documents unsecured:**

- **Example:** A teacher leaves pupil progress reports, SEN records, or child protection concerns on their desk in the classroom or staffroom where other staff, visitors, or even pupils could read them.
  - **Example:** A member of staff finds a sensitive document on a printer and reads the information despite having no involvement with the matter(s) within the document.
4. **Improper disposal of confidential materials:**
    - **Example:** Throwing paper copies of sensitive pupil attendance records, medical information, or HR documents directly into a general waste bin instead of using a secure shredder.
  5. **Sending confidential emails to the wrong recipient:**
    - **Example:** An administrative staff member accidentally emails a spreadsheet containing pupils' addresses and contact details to a parent who was only meant to receive a general newsletter.
  6. **Disclosing unannounced school decisions or plans:**
    - **Example:** A staff member tells parents or friends about a new school policy, staffing changes, or curriculum restructure before it has been officially announced by the leadership team.

These can often be unintentional or seem innocuous, but they still compromise confidential information.

1. **Overheard conversations in public or semi-public spaces:**
  - **Example:** Two teachers discussing a pupil's challenging behaviour or a family situation in a busy staffroom during break time, in the playground during dismissal, or even in a local coffee shop or supermarket, where others (including parents or pupils) could inadvertently overhear. Even if names aren't used, enough detail might allow identification.
2. **Discussing school matters on personal social media:**
  - **Example:** A staff member posts a vague but identifiable comment on Facebook or Instagram about a "tough day with Year 5" or a "difficult meeting with a parent," which, combined with their employment details, could lead to speculation or identification. Even seemingly innocent comments can breach professional conduct.
3. **Using personal devices for school data without proper security:**
  - **Example:** A teacher saves unencrypted pupil data (e.g., assessment grades, contact lists) onto their personal laptop or USB stick for convenience, which is then lost or stolen. While the intent wasn't to breach, the lack of security created a vulnerability.
4. **Sharing anecdotes that reveal identifying information:**
  - **Example:** During a casual conversation with a colleague or friend, a staff member recounts a humorous or frustrating incident involving a pupil or parent. While they might not use a name, specific details (e.g., "the child who wears X uniform and lives near Y landmark," "the parent who drives a Z car and has a child in reception") could make the person identifiable.
5. **Accessing information without a "need to know":**
  - **Example:** A teacher looks up the disciplinary record of a pupil who isn't in their class or about whom they have no direct professional responsibility, purely out of curiosity or gossip. Similarly, accessing another staff member's personnel file without authorisation.
6. **Taking photos or videos of pupils for non-school purposes:**
  - **Example:** A staff member takes a photo of a school event or pupil achievement on their personal mobile phone, which includes identifiable pupils, and stores it on their device or shares it in a personal group chat, even if not publicly. This breaches consent given for school-sanctioned photo use.
7. **Discussing pupils with their own parents (not the child's parent):**
  - **Example:** A parent of a child in the school approaches a staff member (who teaches a different child) and asks about the progress or behaviour of *another* child in the school, or a general situation in the school, and the staff member provides details beyond general, non-confidential information. The parent has no right to confidential information about other children.