



## KINGSWOOD HOUSE SCHOOL

### STAFF BEHAVIOUR AND CODE OF CONDUCT

**Policy reviewed by: Campbell McKelvie**

**Review date: 5 September 2023**

**Next review: 5 September 2024**

#### **Introduction**

This Policy relates to the whole school including all staff, temporary staff and volunteers. It is reviewed annually to ensure compliance with current regulations and law.

The principles underlying the guidance aim to encourage Staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.

Staff are in a unique position of trust and influence as role models for pupils and must adhere to behaviour that sets a good example to all pupils within the School.

Staff also have an individual responsibility to maintain their reputation and the reputation of the School, both inside and outside the work setting. This policy therefore applies equally when staff are conducting lessons online or when it is necessary for them to work from home.

The School requires that all Staff have read and agree to comply with this policy. Breach or failure to observe this policy may result in action being taken under the School disciplinary procedures including, but not limited to, dismissal.

This Policy is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy, staff are expected to exercise their professional judgement and act in the best interests of the pupils and the School.

This policy should be read in conjunction with the following related policies and procedures, which staff should ensure they have read and are familiar with:

- Child Protection and Safeguarding Policy;
- Low-level Concerns Policy
- Equal Opportunities and Diversity Policy;
- Use of Telephone, Email Systems and Internet Policy;
- Social Media Policy;
- Health and Safety Policy;
- Anti-Corruption and Bribery Policy; and
- Whistleblowing Policy.

Staff who work directly with children are required to read and understand Part One and Annex A of the statutory guidance 'Keeping Children Safe in Education'. Those members of staff who do not work directly with children will be required to read [Part One or Annex A] of Keeping Children Safe in Education.

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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](#).

Our expectations of staff are as follows:

- 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.
- We are committed to equal treatment for all pupils regardless of race, sex, disability, religion or belief, sexual orientation, gender reassignment, marital status, pregnancy or maternity ("protected characteristics") and will keep a record of discriminatory incidents.
- We aim to create a friendly, caring and perceptive environment in which every individual is valued.
- We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil.
- We expect our staff to undertake regular consultation activities with our pupils e.g. through form time, questionnaires, participation in workshops and speaking to children about their experiences at lunchtime and play-times.

In general, pupils should be encouraged to discuss with their parents or guardians issues that are troubling them. It may be appropriate to suggest that a pupil sees their Form Teacher or the School's Emotional Literacy Support Assistant (ELSA).

### **Attendance and Timekeeping**

Should a staff member need to be absent or expect to be late for any reason, he/she should ask their Divisional Head or Deputy Head in advance, when possible. If this is not possible, they are asked to contact the Divisional or Deputy Head at the earliest opportunity.

### **Eating and Drinking**

All staff should eat in the dining room with the children, if space allows. Hot drinks can be made in the staff room (or school office for office staff) but on no account should hot drinks be carried around the school without a secure lid.

### **Smoking**

To promote a healthy and pleasant working environment and because of the fire risk, smoking (in any form, including the use of e-cigarettes) is not allowed anywhere on site or within any of the School's vehicles. You must not smoke on school premises or outside school gates. Any member of Staff wishing to smoke must leave the school grounds.

You must not smoke whilst working with or supervising pupil's offsite.

### **Alcohol and Illegal Drugs**

Consumption of alcohol is not permitted on site, save where at a school function or as otherwise agreed by the Head Teacher, when modest amounts of alcohol may be consumed. Consumption of illegal drugs is never permitted.

Employees' conduct and performance must not be adversely impacted by alcohol or drugs, when undertaking their duties.

### **Security**

In the interests of security, employees must wear their identity lanyard whilst in school and sign in and out at the beginning and end of the school day. Staff must not remove any school documents from the site nor take any photographs without due permission. The school reserves the right to search the outer clothing, bags, lockers, vehicles, etc. of staff members whilst on site. The staff member may have a colleague in attendance on such (rare) occasions.

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**

In line with the statutory safeguarding guidance [Keeping Children Safe in Education](#), we should have a staff code of conduct, which should cover 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 (especially with sexual overtones);
- Treat pupils and others with dignity and respect;
- Show tolerance and respect for the rights of others;
- 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 they must act within;
- Adhere to the Teachers' Standards.

### **4. Safeguarding**

Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, and neglect.

Staff will familiarise themselves with our child protection and safeguarding policy and procedures, and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child.

It is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after the children under 18 in the same establishment as the child, even if they do not teach the child.

Staff are expected to familiarise themselves with our allegations procedure in the child protection and safeguarding policy and with our whistleblowing policy which are available in 'Curriculum' under 'Policies' in the Shared Drive as well as in the policies section of our school website. New staff will be shown where the policy is during their induction.

#### **4.1 Low-level concerns about members of staff**

A low-level concern is a behaviour towards a child by a member of staff that does not meet the harms threshold, is inconsistent with the staff code of conduct, and may be as simple as causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with children;
- Having favourites;
- Taking photographs of children on a personal device;
- Engaging in one-to-one activities where they can't easily be seen;
- Using inappropriate language.

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

All staff should share any low-level concerns they have using the reporting procedures set out in our Low-Level Concerns Policy and our Child Protection and Safeguarding

Policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, then we encourage staff to report it.

All reports are handled in a responsive, sensitive and proportionate way.

Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Reporting and responding to low-level concerns is covered in more detail in our Low Level Concerns Policy (See Appendix 1, below) and Child Protection and Safeguarding Policy, which can be found in 'Curriculum', 'Policies' on the Shared Drive as well as in the policies section of our school website.

## **5. 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.

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 and whistleblowing policy.

### **5.1 Physical contact with Pupils**

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore use their professional judgement at all times. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, then the incident and circumstances should be recorded as soon as

possible. The DSL will need to be informed and, if appropriate, a copy placed on the pupil's file.

## **5.2 Physical Restraint**

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing, and reported immediately to the DSL and Headmaster, who will decide what to do next. Where this relates to the school's EYFS setting, parents must be informed of any physical restraint used on their child the same day, or as soon as reasonably practicable.

## **5.3 Physical education and other activities requiring physical contact**

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with pupils, and wherever possible contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games or who offer music tuition will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely or to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

Staff must remember that when supervising changing rooms, there is a fine line between maintaining good behaviour and respecting pupils' privacy.

## **5.4 Transporting Pupils**

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible, and practicable, it is advised that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff and permission given by parents.

## **6. Communication and social media**

School staff's social media profiles should not be available to pupils. If they 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.

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 should not make any efforts to find pupils' or parents' social media profiles.

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 social media policy, e-safety policy and IT acceptable use policy.

## **7. 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. They will also not use personal mobile phones or cameras to take pictures of pupils.

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

## **8. 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.

This information should never be:

- 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 staff'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.

## **9. 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.

## **10. Dress code**

Staff will dress in a professional, appropriate manner.

Outfits must not be overly revealing, and we ask that tattoos are covered up, if possible.

Clothes must not display any offensive or political slogans.

### **11. 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

### **12. Monitoring arrangements**

This policy will be reviewed annually but can be revised as needed. It will be approved by the Head Teacher.

Our Governing Board 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.

### **13. Links with other policies**

This policy links with our policies including:

- Staff disciplinary procedures as set out in the staff handbook, 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;
- Anti-corruption and bribery policy;
- E-safety policy;
- Social medial policy;
- IT acceptable use policy;
- Whistleblowing policy.





## Low Level Concerns Policy

This Policy relates to the whole school, including the Early Years Foundation Stage, and is reviewed annually to ensure compliance with current regulations and law.

This policy should be read in conjunction with other school policies, including:

- Child Protection and Safeguarding Policy;
- The current statutory guidance – “Keeping Children Safe in Education” Part 4, Section 2;
- Staff Behaviour and Code of Conduct Policy;
- Capability and Disciplinary Procedures Policy;
- Grievance Procedure for Staff Policy;
- Whistleblowing Policy;
- Use of Telephone, Email and Internet by Staff Policy.

**Updated by Campbell McKelvie**

**Date Updated  
Review date**

**5 September 2023  
5 September 2024**

### Purpose

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Kingswood House School (“the School”) understands the importance of a positive culture where concerns can be identified and spoken about openly, and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all safeguarding concerns and allegations about all adults working with children are dealt with promptly and appropriately.

Creating a culture in which all safeguarding concerns and allegations about adults (including those that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is crucial. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and 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.

### The aims of the Low-Level Concerns Policy

Kingswood House School - Staff Behaviour and Code of Conduct Policy

The aims of the Policy are to:

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- empower all staff to share any low-level concerns and to help them interpret the sharing of such concerns as a neutral act;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- identify inappropriate, problematic or concerning behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer (“LADO”);
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weaknesses in the School’s safeguarding system.

### **Who does the policy apply to?**

This policy applies to all staff, anyone who is part of the Governance Body and other individuals who work or volunteer in the school.

### **Definition of a low-level concern**

The term ‘low-level concern’ does not mean that it is insignificant. A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school’s Staff Behaviour and Code of Conduct, including conduct outside of the work place; and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern 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.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school’s Staff Behaviour and Code of Conduct Policy), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

### **Reporting low-level concerns**

It is important that where a low-level concern has been identified it is reported as soon as possible to the Head Teacher. However, it is never too late to share a low-level concern if this has not already happened.

Where the Head Teacher is not available, the information will be reported to the designated safeguarding lead (or deputy), i.e. the most senior member of SLT acting in this role.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Head Teacher and those about the Head Teacher will be reported to the Chair of Governors.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Head Teacher of the details as soon as possible.

### **Should staff who share low-level concerns be able to remain anonymous?**

Staff are encouraged to consent to be named, when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named the School will respect that person's wishes, as far as possible. However, there may be circumstances where the staff member who raises the concern will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

### **Should staff share concerns about themselves (i.e. self-report)?**

Occasionally a member of staff may find themselves in a situation, which could be misinterpreted or might appear compromising to others. Staff should proactively self-report, wherever possible – for example, if they know they are going to be in a situation which would be deemed a breach of the School's Staff Behaviour and Code of Conduct. Examples of this are when a member of staff:

- (i) has a child who is a student in the school - they may have the mobile phone number of their child's friend; or
- (ii) plays in an external sports team with a current student and they may be on a whatsapp group with them.

Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Behaviour and Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The School's aim is to create an environment where staff are encouraged and feel confident to self-refer.

### **Recording concerns**

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the Head Teacher, a record of the conversation will be made by them, which will be signed, timed, and dated.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the School will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

### **Responding to low-level concerns**

Where a low-level concern has been raised this will be taken seriously and the Head Teacher will (not necessarily in the below order, but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- Speak to the person reporting the concern to gather all the relevant information;
- Speak to any potential witnesses, unless advised not to do so by the LADO/other relevant external agencies, if they have been contacted;
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or other relevant external agency (HR advice from the Bursar may also need to be taken);
- Review the information and determine whether:
  - the behaviour is in fact appropriate – i.e. is entirely consistent with the School's Staff Behaviour and Code of Conduct and the law;
  - the behaviour constitutes a low-level concern;
  - there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern may meet the harm threshold, in which case they will consult with the LADO;
  - in and of itself the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies; or
  - when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold, and should be referred to the LADO/ other relevant external agencies.
- Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern or allegation, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.
- Consider whether the concern or allegation also potentially raises misconduct or capability issues.

The Head Teacher will be the ultimate decision maker in respect of low level concerns, although it is recognised that depending on the nature of the concern, the Head Teacher may wish to consult with the DSL and take a more collaborative decision making approach.

Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be more appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

In certain circumstances, further information may need to be gathered, so that a proportionate decision about the concern and any further action required can be made. If during this fact finding process potential witnesses need to be spoken to, then this will be undertaken discreetly and on a need-to-know basis.

Once this further information has been gathered a review of the information will take place to determine whether the behaviour:

- Requires any further action;
- constitutes a low-level concern and requires no further action, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes (The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures).
- is consistent with the school's Staff Behaviour and Code of Conduct Policy and procedures under this policy need to be instigated (under these circumstances, feedback will be given to both parties to explain why the behaviour was consistent with this policy);
- is serious enough on its own, or when considered with any other low-level concern(s) previously raised about the same individual, to consult with or refer to the LADO or other relevant external agencies (e.g the Police). In this case HR advice should be sought from the Bursar as to following the school's Staff Behaviour and Code of Conduct Policy, within Child Protection and Safeguarding, or the Capability and Disciplinary Procedures.

When considered with any other low-level concerns that have previously been raised, records will be made of:

- all internal conversations including any relevant witnesses;
- all external conversations, e.g. with the LADO;
- the decision and the rationale for it;
- any action taken.

### **How should low-level concerns be held?**

The School will retain all records of low-level concerns (including those which are subsequently deemed by the Head Teacher to relate to behaviour which is entirely consistent with the School's Staff Behaviour and Code of Conduct) in a central low-level concerns file.

Where multiple low-level concerns have been shared, regarding the same individual, these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded only to a limited number of individuals such as the Head Teacher, DSL, Bursar, Chair of Governors and, where appropriate, the individual they report to.

### **Should the low-level concerns file be reviewed?**

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO, if required. A record of these reviews will be retained.

### **How long should records of a low-level concern be kept?**

Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose, unless the School is required to disclose by law (for example, where the harm threshold is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns, which are held relating to them:

- will only be retained for the same duration as the individual's personnel file; and
- will not be included in any onward reference, except as set out below.

### **References**

Low-level concerns will not be included in references unless they relate to issues which would normally be included in references, for example, misconduct or poor performance. A low-level concern, which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

### **What is the role of the Governors?**

The Head Teacher will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.