



# STAFF CODE OF CONDUCT AT GATEHOUSE SCHOOL

This Code of Conduct forms part of the school's disciplinary rules for staff.

A serious breach of the Code will be regarded as gross misconduct.

A less serious breach may result in a disciplinary warning.

The following applies to all adults who work in this school, not just teachers. We all work professionally and are dedicated to the well-being of all our pupils. However, there are risks of allegations and we want to encourage an environment of best-working practice and reduce the risk of being falsely accused of improper or unprofessional conduct.

Staff should follow the Covid precautionary measures as set out in the Gatehouse School Covid 19 Risk Assessment.

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## **1. Introduction**

Gatehouse school strives to provide a secure, supportive environment which encompasses the wellbeing of all pupils in our care.

Our duty to safeguard pupils is paramount and is just as important as our determination to make all our teaching and learning of the highest quality. We need to ensure that pupils and staff are safe and that we maintain a safer culture.

Safeguarding involves not only Health and Safety issues, but establishing a culture that prevents any form of abuse of pupils being perpetrated either in school or elsewhere.

In the same way that we need guidance on certain aspects of managing behaviour, it is equally important to have clear guidelines as to what constitutes good practice in dealing with pupils, and what to avoid. In the event of any legal action, agreeing such guidelines will protect not only all our pupils, but all the teaching and ancillary staff (and all other adults and volunteers who work with young people.)

The governing body of Gatehouse School is committed to fostering a culture of the highest professional standards. This Code of Conduct sets out the standards expected and the duty upon all staff, volunteers and governors to abide by as we have a duty to keep pupils and ourselves safe and to protect ourselves from physical and emotional harm. This duty is, in part, exercised through the development of respectful, caring and professional relationships between adults and pupils and behaviour by adults that demonstrates integrity, maturity and good judgment.

Following this Code of Conduct will help to safeguard all staff, governors and volunteers from being maliciously, falsely or mistakenly suspected or accused of professional misconduct in relation to pupils.

## **2. Set of General Guiding Principles**

This Code of Conduct cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. However, it does highlight behaviour that is illegal, inappropriate or inadvisable in relation to pupils. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the pupil where no specific guidance has been given. Adults are expected to make responsible and informed judgements about their own behaviour in order to secure the best interests and welfare of the pupils in their charge.

Staff, governors and volunteers must feel able to raise issues of concern and everyone must fully recognise the duty to do so, particularly in terms of child protection. A member of staff who, in good faith, "whistle blows" or makes a public interest disclosure will have the protection of the relevant

legislation.

If staff have concerns they raise them with the Designated Safeguarding Lead (DSL) Miss Fiona Tighe, or one of the four Deputy DSL's:

Mrs Sevda Korbay, Headteacher, Deputy DSL

Freya Williams, school nurse, Deputy DSL

Jenni Veitch, Head of Pastoral Care, Deputy DSL

Aileen Reidy, Head of EYFS, EYFS Deputy DSL

Anyone can make a referral directly to the children's social care immediately if there is a risk of serious harm: Miss Melonie Benzie (LADO) contact details: 020 7364 0677/07903 238827 / LADO@towerhamlets.gov.uk.

Where an allegation of abuse is made against a member of staff, the governing body will follow the guidance set out in Safeguarding Children and Safer Recruitment in Education published by the DCSF and in force from January 2007, and KCSIE Part Four, April 2014. This guidance is about managing allegations that might indicate that a person is unsuitable to continue to work with children in their present position, or in any capacity. It will be used where it is alleged that a member of staff or a volunteer or a governor has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or,
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

Staff involved in the recruitment of new staff will have completed safer recruitment training. Teaching staff are encouraged to complete the training which alerts us to the dangers of abusers in education, grooming and what actions to take if such abuse is discovered.

All new staff, whatever their experience, will be provided with a full induction programme that covers policies and routines of the school with particular emphasis on child safeguarding. Gatehouse School's Designated Safeguarding Lead is Miss Fiona Tighe.

All staff must familiarise themselves with all school policies including safeguarding, fire drill and the crisis management policy. All staff have been given access to section 1 of the 2020 version of the KCSIE document and signed a declaration that they have read it. Regular updated training and reminders will be provided on child protection, equality or training related to individual or groups of pupils' needs.

All staff must follow the School's Behaviour Policy and implement the Rewards and Sanctions system consistently and fairly, including following the correct referral and recording procedures.

### 3. Principles of Professional Practice

3.1. All staff, governors and volunteers as appropriate to the role and/or job description of the individual, must:

- always project a positive image of the school
- place the well-being and learning of pupils at the centre of their professional practice

- understand their responsibilities to safeguard and promote the welfare of pupils
- not humiliate, embarrass or undermine pupils or colleagues in any way
- take responsibility for their actions and behaviour
- avoid any conduct which would lead any reasonable person to question their motivation and intentions
- work in an open and transparent way
- acknowledge that deliberately invented and malicious allegations are extremely rare and that all concerns are reported and recorded
- discuss and take advice from the headteacher if they have acted in a way which may give rise to concern
- apply the same standard of professionalism regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- have high expectations for all pupils, be committed to addressing underachievement, and work to help pupils progress regardless of their background and personal circumstances
- treat pupils and colleagues fairly and with respect, take their knowledge, views, opinions and feelings seriously, avoid gossip, and value diversity and individuality
- With colleagues and pupils, model the characteristics they are trying to inspire in pupils, including enthusiasm for learning, a spirit of enquiry, honesty, tolerance, social responsibility, patience, and a genuine concern for other people
- respond sensitively to the differences in the home backgrounds and circumstances of pupils, recognising the key role that parents and carers play in pupils' education
- seek to work in partnership with parents and carers, respecting their views and promoting understanding and co-operation to support the young person's learning and well-being in and out of school
- reflect on their own practice, develop their skills, knowledge and expertise, and adapt appropriately to learn with and from colleagues
- not use inappropriate language to or in front of pupils
- not discuss their personal relationships to or in front of pupils
- not consume or be under the influence of alcohol or any substance, including prescribed medicine, which might affect their ability to care for children
- not smoking on the premises or within sight of pupils or the school, or when supervising pupils at out of school events and activities
- adhere to policies and practices of the school
- be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including barring by the Disclosure and Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA)
- not bring the school into disrepute

3.2. A teacher is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career. Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by:

- treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
- having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others
- not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law
- having proper and professional regard for the ethos, policies and practices of the school in which they teach, and maintain high standards in their own attendance and punctuality
- having an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities
- not smoking on the school premises or in sight of the school premises
- not consuming alcohol on the school premises except when this has been agreed by the Head Teacher and when there are no children on the premises under staff supervision

#### 4. **Confidentiality**

- 4.1. Members of staff and governors may have access to confidential information about pupils in order to undertake their responsibilities. In some circumstances the information may be highly sensitive. Confidential or personal information about a pupil or her/his family must never be disclosed to anyone other than on a need to know basis. In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. Information must never be used to intimidate, humiliate, or embarrass the pupil.
- 4.2. There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay to those with designated pupil protection responsibilities.
- 4.3. Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security protected school equipment. Information must only be stored for the length of time necessary to discharge the task for which it is required.
- 4.4. If a member of staff is in any doubt about the storage of sharing of information s/he must seek guidance from the Headteacher. Any media or legal enquiries must be passed to senior management.

#### 5. **Propriety, Behaviour, Reputation and Appearance**

- 5.1. All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of pupils. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general. An individual's behaviour, including use of language, either in or out of the workplace, should not compromise her/his position within the work setting or bring the school into disrepute.

- 5.2. A person's dress and appearance are matters of personal choice and self-expression. However staff and volunteers must ensure they are dressed decently, smartly, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct. See the Staff Handbook for more information.
- 5.3. Personal property of a sexually explicit nature such as books, magazines, DVDs or such material on any electronic media must not be brought onto or stored on the school premises.
- 5.4. Social networking sites and blogging are extremely popular. Staff must not post material which damages the reputation of the school or which causes concern about their suitability to work with children and young people. Those who post material which could be considered as inappropriate could render themselves vulnerable to criticism or allegations of misconduct. See the E-safety policy and the staff handbook.

## **6. Sexual Contact with Children and Young People and Abuse of Trust**

- 6.1. Any sexual behaviour, whether homosexual or heterosexual, by a member of staff, volunteer or governor with or towards a child or young person is illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether there is consent or not. All adults working in the school who have contact with pupils are in positions of trust.
- 6.2. Sexual behaviour includes non-contact activities, such as causing a child or young person to engage in or watch sexual activity or the production of indecent images of children.
- 6.3. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or young person, and manipulate that relationship so that sexual abuse can take place. Staff and volunteers should be aware that conferring special attention without good reason or favouring a pupil has the potential to be construed as being part of a 'grooming' process, which is a criminal offence.
- 6.4. A relationship between a member of staff, a volunteer or a governor and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of pupils and all adults have a responsibility to ensure that the unequal balance of power is not used for personal advantage or gratification. It is important to recognise that women as well as men may abuse a position of trust.

## **7. Infatuations and Crushes**

- 7.1. Adults must recognise that a pupil may be strongly attracted to a member of staff or volunteer and/or develop a heterosexual or homosexual infatuation. A member of staff or volunteer, who becomes aware that a pupil may be infatuated with him/herself or a colleague, must report this without delay to a senior colleague so that appropriate action can be taken. The situation will be taken seriously and the adult should be careful to ensure that no encouragement of any kind is given to the pupil. It should also be recognised that careless and insensitive reactions may provoke false accusations. Whilst the risk of infatuation is not limited to younger members of staff, newly qualified teachers must recognise their particular vulnerability to adolescent infatuation.

7.2. Seeking advice in circumstances where concerns arise. Examples of situations which must be reported are given below:

- where a member of staff or volunteer is concerned that he or she might be developing a relationship with a pupil which could have the potential to represent an abuse of trust
- where a member of staff or volunteer is concerned that a pupil is becoming attracted to him or her or that there is a developing attachment or dependency
- where a member of staff or volunteer is concerned that actions or words have been misunderstood or misconstrued by a pupil such that an abuse of trust might be wrongly suspected by others
- where a member of staff or volunteer is concerned about the apparent development of a relationship by another member of staff or volunteer, or receives information about such a relationship.

## 8. **Gifts**

8.1. Staff need to take care that they do not accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment. There are occasions when pupils or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value. Any staff member receiving gifts or entertainment over the value of £100 from an individual or family, must declare this to the school business manager.

8.2. Personal gifts must not be given to pupils. This could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return. Any reward given to a pupil should be consistent with the school's behaviour policy, recorded, and not based on favouritism.

## 9. **Social Contact and Social Networking**

9.1. Staff in school should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. This includes social networking sites such as Twitter, Instagram, Facebook, WhatsApp and either professional or personal Vlogs or Blogs. Even if a pupil seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgment in making a response and be aware that such social contact in person, by phone or on the internet could be misconstrued and may place the member of staff in a very vulnerable position.

9.2. Staff and volunteers must not give their personal details such as home/mobile phone number; home or email address to pupils unless the need to do so is agreed with senior management and the reasons are recorded.

9.3. No home visits should be conducted in a professional capacity for any reason. If you are socially invited to the home of a pupil by a parent, or to a social event outside of school by invitation from a parent, inform the headteacher.

## 10. **Physical Contact and Personal Privacy**

- 10.1. 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. When physical contact is made with pupils this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one pupil in one set of circumstances may be inappropriate in another, or with a different pupil.
- 10.2. Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. If a member of staff or volunteer believes that an action could be misinterpreted, the incident and circumstances should be reported.
- 10.3. Physical contact, which occurs regularly with a pupil or pupils, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school policy and subject to review. Where feasible, staff should seek the pupil's permission before initiating contact. Staff should listen, observe and take note of the pupil's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the pupil for the minimum time necessary.
- 10.4. There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- 10.5. Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from the Designated Safeguarding Lead, the Headteacher, the Deputy Head, the Deputy Safeguarding Lead or the School Nurse.
- 10.6. Some staff, for example, those who teach PE and games, or who provide 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, 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 pupil.
- 10.7. Pupils are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard pupils, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the pupils concerned and sensitive to the potential for embarrassment.
- 10.8. Staff with a job description which includes intimate care duties will have appropriate training and written guidance. No other member of staff or volunteer should be involved in intimate care duties except in an emergency.

## 11. **Behaviour Management and Physical Intervention**

- 11.1. All pupils have a right to be treated with respect and dignity. Corporal punishment or threatening



corporal punishment is unlawful in all schools. Staff and volunteers must not use any form of degrading treatment to punish a pupil. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation. Shouting aggressively or hectoring is not acceptable in any situation. Deliberately intimidating pupils by overwhelming physical presence is not acceptable in any situation.

- 11.2. The circumstances in which staff can physically intervene with a pupil are covered by the 1996 Education Act. Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence. The school has a separate policy on the use of physical intervention which forms part of this Code of Conduct.
- 11.3. Gatehouse School has trained first aiders/appointed persons. A designated first aid room is available. A notice of where First Aid boxes are located is in the post room (opposite the School Reception area). A full list of trained personnel is found in Appendix A of the First Aid Policy.

## 12. **One to One Situations and Meetings with Pupils**

- 12.1. Staff working in one to one situations with pupils are more vulnerable to allegations. Staff must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and pupils are met. Staff should always work in accordance with the Lone Working Policy. The Designated Safeguarding Lead will, if appropriate, undertake a risk assessment in relation to the specific nature and implications of one to one work for each worker and pupil. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of the school and to ensure that the door to the room is left open and/or visual/auditory contact with others is maintained. Any arrangements, if considered appropriate, will be reviewed on a regular basis by the designated safeguarding persons/lead in conjunction with the member of staff.
- 12.2. Pre-arranged meetings with pupils away from the school premises or on the school site when the school is not in session are not permitted unless approval is obtained from their parent/guardian and the Headteacher or Deputy Head with delegated authority.

## 13. **Transporting Pupils**

- 13.1. Adults should ensure that their behaviour is safe and that the transport arrangements and the school vehicles meet all legal requirements. They must ensure that the school vehicles are roadworthy and appropriately insured and that the maximum capacity is not exceeded.
- 13.2. Bus drivers must inform the school of any penalties or prohibitions on their licence.
- 13.3. Staff members must not transport or transfer pupils in their own vehicles unless authorised to do so by the headteacher because a child might otherwise be at risk. The incident would be reported immediately to the parent/s of the child and recorded on CPOMS..

## 14. **Educational Visits and School Clubs**

- 14.1. Staff and volunteers should take particular care when supervising pupils in the less formal atmosphere of an educational visit, particularly in a residential setting, or after-school activity. Staff and volunteers remain in a position of trust and the same standards of conduct apply. The school has a policy on educational visits which forms part of this Code of Conduct.
- 14.2. Staff may only smoke on a residential trip when off duty and away from the children and their environment so the children are not adversely affected by passive smoking.
- 14.3. Staff on residential trips cannot consume any alcohol at any point due to the possibility of impaired judgement when in a supervisory role.
- 14.4. The organiser/ lead teacher on an off-site trip or visit will ensure that the Medicines and Medical Conditions Policy is adhered to and that all medication required is taken on the trip.

## 15. **Curriculum**

- 15.1. Many areas of the curriculum can include or raise subject matter which is of a sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.
- 15.2. The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sensitive nature. Responding to pupils' questions can require careful judgement and staff must take guidance in these circumstances from the designated safeguarding persons/lead or a senior member of staff. Refer to the PHSE policy for extra guidance regarding relationships and drug awareness sensitivity.

## 16. **Photography, Videos and other Creative Arts**

- 16.1. Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. The Data Protection Act 2018 affects the use of photography. An image of a child is personal data and it is, therefore, a requirement under the Act that consent is obtained from the parent of a child for any images made such as those used for school websites, productions or other purposes.
- 16.2. Staff need to be aware of the potential for such images to be misused. Careful consideration should be given as to how these activities are organised and undertaken. Particular regard needs to be given when they involve young or vulnerable pupils who may be unable to question why or how the activities are taking place. Pupils who have been previously abused in this way may feel threatened by the use of photography, filming etc. in the teaching environment. If in any doubt, please see the Data Protection Controller (The Bursar).
- 16.3. Staff should remain sensitive to any pupil who appears uncomfortable and should recognise the potential for misinterpretation. It is also important to take into account the wishes of the child, remembering that some children do not wish to have their photograph taken.
- 16.4. Using images of pupils for publicity purposes will require the age-appropriate consent of the individual concerned and their legal guardians. Images must not be displayed on websites, in

publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.

16.5. When using a photograph the following guidance must be followed:

- if the photograph is used, avoid naming the pupil
- if the pupil is named, avoid using the photograph
- images must be securely stored and used only by those authorised to do so.
- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- ensure that all images are available for scrutiny in order to screen for acceptability
- be able to justify the images made
- do not make images in one to one situations
- do not take, display or distribute images of pupils unless there is consent to do so

16.6. The school has additional guidance on the use of images which includes a consent form. The guidance forms part of this Code of Conduct.

## 17. **Internet Use, mobile and other forms of Electronic Communication**

17.1. The school has separate policies on internet use, personal use of mobile phones, electronic devices, electronic communication and security which form part of this Code of Conduct.

17.2. Failure to adhere to this policy will lead to disciplinary matters.

17.3. Staff must ensure that there is no inappropriate or illegal content on their personal devices.

17.4. Staff are permitted to use their personal mobile phones/devices in an emergency situation/school trips, such as contacting the school or the emergency services. Staff should never take photographs of children on their personal mobile phones and/or devices.

17.5. In an emergency situation, (with permission) staff are permitted to take incoming calls on their mobile phones during teaching situations.

17.6. It is the responsibility of all members of staff to be vigilant and report concerns to a member of the Senior Leadership team or the DSL.

17.7. Wherever possible, personal use of mobile phones and devices should be restricted to break times, in designated staff areas and when children are not present in the setting.

17.8. Under no circumstances should adults in school access inappropriate images. Deliberately accessing pornography on school equipment will be treated as gross misconduct and may be a criminal offence. Accessing indecent images of children on the internet, and making, storing or disseminating such material, is illegal and is likely to lead to criminal prosecution and may result in barring from work with children and young people.

## 18. **Sharing Concerns and Recording Incidents/ Whistleblowing**

- 18.1. All staff, volunteers and governors must be vigilant and share concerns and report incidents. Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The following “Red Flag Behaviours” give indications of the kinds of situations which should be shared with a senior member of staff.

An adult who:

- Allows a pupil/young person to be treated badly; pretends not to know it is happening
- Gossips/shares information inappropriately
- Demonstrates inappropriate discriminatory behaviour and/or uses inappropriate language
- Dresses in a way which is inappropriate for their role
- Does not treat pupils fairly - demonstrates favouritism
- Demonstrates a lack of understanding about personal and professional boundaries
- Uses his/her position of trust to intimidate, threaten, coerce or undermine
- Appears to have an inappropriate social relationship with a pupil or pupils
- Appears to have special or different relationships with a pupil or pupils
- Seems to seek out unnecessary opportunities to be alone with a pupil

### **Low-level concerns**

As part of a whole School approach to safeguarding, Gatehouse School seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School’s low level concerns policy is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.

A “low-level’ concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult has acted in a way that:

- Is inconsistent with the School’s Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO. NB: The term ‘low-level’ does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.

Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to:

being overly friendly with pupils;  
showing favouritism;  
taking photographs of pupils on a personal device;  
or using inappropriate sexualised, intimidating or offensive language.

Staff are required to report any concerns about any adult (including a person employed by a

supply agency or a contractor) to the Head Teacher. In the case of supply staff, and contractors their employers will be notified so any patterns of inappropriate behaviour can be identified.

Where the concern relates to the Head Teacher, it should be reported to the Chair of Governors. Such reports should be made without undue delay.

Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Head Teacher/Chair of Governors when the matter has been investigated.

A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Head Teacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

Full details of how the Head Teacher will go about investigating low-level concerns are set out below:

All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Head Teacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School.

Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.

Records of low-level concerns will be reviewed at least termly by the DSL, Head Teacher and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified.

Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

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|-------------|---|------|---|
| Policy Name | <b>Staff Code of Conduct for Safer Working Practice</b> | Date | October 2014 updated<br>Jan 2017 updated<br>August 2019 |
|-------------|---|------|---|

|              |                      |                  |             |
|--------------|----------------------|------------------|-------------|
| Status       | Mandatory            | Governors Review | Summer 2021 |
|              |                      | Next Review      | Summer 2022 |
| Distribution | All Staff, Governors |                  |             |