

Staff Code of Conduct

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Approver: Philip Attwell

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'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Pre-Prep and Nursery School)

'College' refers to Cheltenham College Senior School

'Cheltenham Prep' refers to Cheltenham College Preparatory School

'Nursery and Pre-Prep' refers to Cheltenham College Nursery School and Pre-Prep

The aim of this code is to give guidance and advice to all staff at Cheltenham College, but should not replace professional common sense and good judgement. It must be read in conjunction with Working at Cheltenham College and School's policies. It incorporates the Safer Working Practice document and should be read in conjunction with the following policies:

- ☐ Child Protection and Safeguarding
- ☐ Whistleblowing
- ☐ Anti-bullying
- ☐ Anti-bribery
- ☐ Trips Management (College)
- ☐ Welfare, Health and Safety on Educational Trips (Prep)
- ☐ Alcohol
- ☐ Restraint and Reasonable Force
- ☐ Dignity at Work

It is designed to support and protect both staff and pupils at Cheltenham College. In this policy where the word 'staff' is used this, where appropriate, will apply to associated responsible adults including volunteers, self-employed service providers etc.

Reading, understanding and acting upon the College's Child Protection and Safeguarding policy and all related key policies; this is the overarching responsibility of all staff working either at College or Cheltenham Prep in whatever capacity. Should any member of staff have a child protection or safeguarding concern about a colleague's interaction with a child, this should be reported to the Head without delay.

All policies referred to in this document can be found on the 'Policy Portal.' If you do not have access to this online facility, you can obtain copies from your Line Manager or the HR Team.

Cheltenham College Staff

All staff are expected to support and uphold the Values, Aims and Objectives of the College, and in doing so, they are expected to abide by the principles below:

- 1. Give priority to the wellbeing, development, and progress of pupils to promote a 'child safe' culture.**

- Always act in the best interests of the children in your care and do your utmost to promote a 'child safe' culture.
- Take all reasonable steps to ensure the safety and wellbeing of pupils under your supervision.
- Use your professional expertise and judgement to do the best for pupils in your care, always acting, and being seen to act, in their best interests.
- Do not use language to humiliate, demean or undermine a pupil and do not use swear words when pupils are present. There are many words that have the potential to negatively impact pupils' wellbeing and learning. However, as use of the N-word and P-word can be particularly damaging, they must not be used. Where the N-word appears in a resource or text, specific instruction must be given beforehand; pupils must be informed that it is never acceptable to use the word in their own language, even if it has appeared in a resource or text. In order to minimise misconception or doubt, Cheltenham College considers the use of the N-word or P-word to be unacceptable by any member of its community, whatever their racial identity or circumstance. This includes articulating the word when teaching particular material or playing music which contains such words.
- Establish and maintain appropriate professional boundaries in your relationships and communications with pupils (see the Guidance Notes section).
- Information should be passed on to HsMs and Tutors or Section Heads as appropriate, and in a timely fashion to ensure pupils are well supported, and our high expectations of pastoral care are maintained.
- If a member of staff has any concerns with regard to the practice of a teacher or other professional, they must raise their worries with the appropriate Line Manager/Senior Manager (see Whistleblowing policy/Low Level Concerns Process).
- Health and Safety is everyone's responsibility. Staff should ensure they know the fire exit routes and assembly points for any building they regularly work in. Staff should also recognise the Lockdown alarm and the appropriate action to take if the alarm is sounded.

2. Take responsibility for maintaining and developing their professional roles.

(For more detail on this section please read your job description)

This section applies primarily to teaching staff, but all staff should be mindful of developing themselves as professionals.

- Ensure and maintain good subject knowledge and become fully acquainted with the appropriate specifications and schemes of work and carry out the requirements thereof.
- Develop teaching strategies to enable all pupils to access subject knowledge and understanding.
- Develop and manage the classroom environment in a way conducive to successful learning and the maintenance of good pupil discipline, making use of sanctions and rewards in line with school policies.
- Adhere to the school's assessment and reporting policies and deadlines.
- Engage in the staff professional review process and use it to reflect on their practice in order to develop professionally.
- Engage positively in the school's Professional Development Programme.
- Training and Compliance:
 - Staff must complete all mandatory training required by College, including the annual Compliance Training which covers but not limited to safeguarding, health & safety, data protection, dignity at work, and Prevent.
 - Training requirements and refresher intervals are set out in the relevant College policies - these may be updated from time to time. Staff are expected to maintain current certification in these areas as part of their professional responsibilities under this Code.

3. Help pupils to become confident and successful independent learners.

(Although this applies most to teaching staff, all staff should ensure our pupils are aided in this area as appropriate.)

- ☐ Have high expectations of all pupils and communicate this to them with appropriate sensitivity and tact.
- ☐ Encourage every pupil to have high expectations of themselves in all areas.
- ☐ Provide opportunities to challenge all pupils.
- ☐ In line with the school Pupil Behaviour Policies (there are separate policies for College and Prep) celebrate success and strive to help all pupils overcome difficulties and setbacks.
- ☐ Provide constructive criticism to allow all pupils to evaluate their progress.
- ☐ Promote an environment where all pupils feel safe and secure and their views are listened to and considered.
- ☐ Help all pupils to learn to 'think for themselves' so that by the time they leave school they can successfully engage in the world beyond.

4. Demonstrate respect for diversity and promote equality.

- ☐ Act respectfully towards all pupils, parents, guardians and colleagues whatever their socio-economic background, culture, age, gender, sexual orientation, disability, race, religion or belief, demonstrating all are of equal value.
- ☐ Take responsibility for understanding and complying with school policies relating to equality of opportunity and bullying.
- ☐ Appropriately challenge discrimination, bullying and stereotyping, no matter what its source.
- ☐ Help create a fair and inclusive school environment for all pupils and colleagues.
- ☐ Help pupils to understand and consider different views, perspectives and experiences.
- ☐ Encourage pupils to develop positive relationships both within school and in the local community.
- ☐ Actively promote Fundamental British Values (see section later in this policy).
- ☐ Avoid the promotion of particular political views or ideologies.
- ☐ In line with the school's Prevent policy, report any concerning behaviour.

5. Strive to establish a productive partnership with parents and guardians.

- ☐ Follow school policies and procedures on communication with parents/guardians.
- ☐ Ensure regular communication with parents/guardians as appropriate, particularly where important choices/decisions are being considered.
- ☐ Provide parents/guardians with accurate information about their child's progress, in line with the school's reporting system.
- ☐ Consider and respect parents'/guardians' views and perspectives, including those that relate to their children's development.
- ☐ Take every opportunity to be proactive in communication with parents/guardians, particularly in giving good news as well as bad.
- ☐ Ensure that all actions taken enable the College to maintain good relationships with parents/guardians and those outside our community.

6. Work as part of a whole school team and co-operate with other professional colleagues.

- ☐ Endeavour to develop productive and supportive relationships with all school colleagues in both, and between schools.
- ☐ Communicate and establish, as appropriate, productive working relationships with other professional bodies.
- ☐ Exercise any leadership and management responsibilities in a respectful, inclusive and fair way, and in accordance with contractual obligations.
- ☐ Uphold school policies and procedures and raise any concerns about the life or running of the school in a responsible and appropriate way.
- ☐ Contribute to colleagues' learning and development; be honest, accurate and constructive when giving references, during mutual observations and for professional review purposes.
- ☐ Show commitment to the co-curricular programme.

7. Demonstrate honesty, integrity and high moral standards and endeavour to ensure all actions are in the best interests of the Cheltenham College community.

- ☐ Staff should always act in a professional and transparent manner; do not behave in a way that could reasonably be subject to misinterpretation.
- ☐ Although the school respects colleagues' right to a private life it is important to recognise the importance of being an ambassador of the school and take responsibility for upholding the widespread reputation of Cheltenham College at all times. Staff should be aware that their conduct outside College could potentially raise concerns as to their suitability to work with children.
- ☐ Exercise your responsibility in relation to the examination and assessment of achievement and attainment in a fair, transparent and honest way.
- ☐ Take responsibility for your own actions and behaviour.
- ☐ Demonstrate honesty and integrity in management and administrative duties, including the use of school property and finance.
- ☐ Adopt the highest standards of personal conduct in order to maintain the confidence and respect of pupils, parents/guardians and the general public in your ability to safeguard the welfare and best interests of the pupils in our care and children using our facilities.
- ☐ Staff should always be mindful of drinking alcohol around pupils, and should never put themselves in a position where they could be accused of consuming too much alcohol or being drunk.
- ☐ Demonstrate high standards of appearance, behaviour and language appropriate to the situation.
- ☐ Do not show favouritism to one pupil or group of pupils over another. The giving of gifts can be subject to misinterpretation and can be seen as bribery or grooming. Discuss any gifts or rewards used in your professional life with your Line Manager to ensure that they are acceptable. Conferring special attention and favour upon one pupil might be misinterpreted. If staff are concerned about a colleague showing favouritism they should raise this with their Line Manager or the relevant member of the Senior Leadership Team at College or Cheltenham Prep. This should also be reported as a low level concern (see Appendix 1)
- ☐ If a member of staff becomes aware that a pupil is behaving towards them in a way that suggests that they may have become infatuated, they must ensure that their own behaviour cannot be subject to misinterpretation. Staff should advise their Line Manager and the relevant HsM so that appropriate and sensitive action can be taken. They should also self-refer in accordance with the Low Level Concerns process (see Appendix 1), putting their concern in writing and sending it to: concerns@cheltenhamcollege.org at College and prep.concerns@cheltenhamcollege.org for The Prep.
- ☐ External exams and conflicts of interest - Due to our experienced and professional teaching body, there may be instances whereby a senior teacher may be both employed by Cheltenham College as well as by an Examination Board. This may be in a capacity whereby they may be tasked with either setting external examination questions or having access to examination materials, such as speaking test or practical assessment material that our pupils may sit. A teacher considering involvement in external examinations must discuss this with the Deputy Head Academic.
- ☐ Members of staff whose children are pupils at the school must conduct themselves as Cheltenham College would expect of other parents. They must ensure that their children do not overhear conversations about other pupils, staff members or College business and should not access information about their child that would not be available to other parents. Communications about their child/ren should be addressed through the usual channels i.e. through tutors or HsMs and form teachers or Heads of Section at The Prep.

Guidance Notes

Communication between staff and pupils/parents/guardians.

Cheltenham College places a great deal of emphasis on its communication. This is an aspect of school life that can cause a number of difficulties if care is not taken. It is also not possible to give strict rules that will govern every circumstance however the following guidelines should be observed:

- ☐ Email communication with parents must be sent via school email addresses only and should be prompt and courteous. (Please refer to school protocol in the Staff ICT Acceptable Use Policy for further details.)
- ☐ Staff have a responsibility to check carefully the email address that they type when using email.
- ☐ Email communication with pupils must be via school email addresses only.
- ☐ Communication with pupils and Old Cheltonians on personal social network sites should occur only after a pupil has left school for a full twelve months. There should be no social media contact with a pupil under the age of 18, no matter how long they have departed College. Communications should remain professional and staff should exercise particular caution when socialising with past pupils. It is not appropriate to have an existing school pupil as a contact on any such site.
- ☐ Staff should ensure that pupils are only referred to using First Name if using social media.
- ☐ Staff should take particular care over security settings on any social network sites and seek guidance from Cheltenham College IT staff if unsure. They should also remember the importance of being an ambassador of the school and take responsibility for upholding the widespread reputation of Cheltenham College when posting any electronic messages.
- ☐ Phone communication with pupils should be by using school phones. School mobiles can be booked for trips and all houses have mobile phones which should be used for house trips. It is not appropriate, except in exceptional circumstances, to use personal mobile phones. (There are times when permission may be given for an individual's phone to be used but this must be discussed with the relevant member of the Senior Leadership Team at College or Cheltenham Prep.).
- ☐ If communication with pupils occurs through non-school recognised channels, perhaps in emergencies, the relevant member of the Senior Leadership Team at College or Cheltenham Prep, should be informed as soon as reasonably possible.
- ☐ Staff are expected where possible, to use photographic and media equipment provided by the School. If an image is taken on a personal device for College approved marketing purposes, it should be deleted immediately after the image has been uploaded. The storage of images containing Cheltenham College pupils should be on the school system only. In the instance where school equipment is not available or inappropriate, permission must be sought from the relevant member of the Senior Leadership Team at College or Cheltenham Prep. Staff should be able to justify images of pupils in their possession, and should certainly avoid any images of a pupil and teacher in a one-to-one situation.
- ☐ If a member of staff feels that they are being 'unnecessarily' contacted by a pupil/parent/guardian they should inform the relevant member of the Senior Leadership Team at College or Cheltenham Prep, so that an agreed course of action can be taken.
- ☐ If a member of staff has a pupil mobile number on their phone for any reason, the Deputy Head Pastoral must be informed.
- ☐ Personal mobile phones should not be used whilst staff are in the vicinity of pupils except for school business and/or emergencies.
- ☐ Ensure parental permission exists for photos to be displayed.
- ☐ College social media accounts may only be created with the approval of the College Marketing team. Any posting of photographs or videos must comply with GDPR regulations.

Socialising

Cheltenham College is a very sociable school with many opportunities for social interactions between staff and pupils. Staff should at all times remember their professional responsibility at such occasions.

- ☐ There are clear guidelines for pupils/staff in the Alcohol Policy, regarding the purchase and consumption of alcohol, which must be adhered to.
- ☐ Staff should also be aware that their own consumption of alcohol should be appropriate to the occasion. It is not appropriate for a member of staff to 'buy a pupil a drink' in a Pub or invite an individual pupil out for a social occasion. Should a member of staff find themselves in a bar with College pupils, staff should ensure that they do not socialise with them in these circumstances. Appropriate measures should be taken to report pupils who may be in breach of College rules. Staff may take pupils out on tutor outings but the guidance on alcohol must be adhered to.
- ☐ Staff must not invite pupils to your home or meet with them socially.
- ☐ Where possible and reasonable, conduct one-to-one meetings with pupils in an environment where the door can be kept open or you are visible by other means. If this is not possible then ensure that an appropriate distance is maintained and advise a colleague, preferably beforehand, of such a meeting.
- ☐ Care must be taken when a member of staff is in regular 1:1 contact with a pupil outside the normal school day. (The Deputy Head Pastoral should be made aware if this needs to be the case).
- ☐ Cheltenham is a small town and as such there may be occasions when a member of staff comes into contact with pupils in a Pub/Club. Staff should ensure that school rules are adhered to.
- ☐ Social events hosted in Houses must adhere to 20.10 NMS guidance.

Whilst Cheltenham College encourages staff to have positive working relationship with pupils any inappropriate contact between pupils and staff (via text, social media, email or physical contact for example) would be dealt with as a disciplinary issue and referred to statutory external bodies as required.

- ☐ Staff should not use their status and standing to form or promote relationships which are of a sexual nature or which may become so.
- ☐ Staff should not have any sexual relationships with any pupil or have any communication which may be interpreted as sexually suggestive.
- ☐ Staff should not make sexual remarks to or about any young person or discuss their own sexual relationships with pupils.
- ☐ Staff should make house staff aware if they are in a boarding house during the evening outside of their duty times.
- ☐ House staff and tutors must not conduct meetings in the **private** rooms on the private side, whether one-to-one or social gatherings. These should only take place in designated spaces approved by the DHP.
- ☐ Staff should refer to the Child Protection and Safeguarding Policy for further guidance on one-to-one contact with pupils.
- ☐ Staff should be aware that concerns raised about their conduct outside of College, may indirectly raise concerns about their suitability to work with children. In such instances, advice would be sought from the LADO.

Dress

- ☐ Always dress and act in a manner that supports Cheltenham College's ethos, rules and policies. You should dress in a way which is appropriate to your role.
- ☐ Clothing should be appropriate to your role and should not be likely to be viewed as offensive, revealing or sexually provocative.
- ☐ Clothing should not give cause for embarrassment or misunderstanding and should be absent of any political or contentious slogans.

- ☐ If a member of teaching staff is required to change for an activity straight after teaching then it may be appropriate to change at break. This should be avoided if possible.
- ☐ If you wear Cheltenham College branded clothing, in or out of school hours and on or off College grounds, please be mindful that you are acting as an ambassador for the School as referenced in "Working at Cheltenham College".
- ☐ College lanyards should be worn and be visible at all times.

Alcohol

Pupils

- ☐ College encourages a mature and responsible approach to alcohol and pupils are encouraged to adopt a similarly sensible approach whilst making them fully aware of the dangers to both themselves and others. A responsible attitude to drinking is promoted through the FLOREAT programme and through guidelines laid down for Upper College pupils while in Houses, at social functions, on College trips and in Town on Saturday evenings.
- ☐ Help and advice is always available to both staff and pupils through the school's Health Centre and counsellors.
- ☐ The College Alcohol Policy provides guidance including the purchase and serving of alcohol and staff must read this policy to fully understand their responsibilities.

Staff and Cheltenham College Vehicles

- ☐ Staff must not drink any alcohol on the day they are driving any school vehicle.
- ☐ Staff must be mindful of the dangers of driving a school vehicle the morning after drinking alcohol and be aware that alcohol stays within their system.

Away from Cheltenham College

- ☐ On any trips away from College the Trips Management Policy must be read. The staff member in charge of the trip takes on the responsibility of the DHP or HsM.
- ☐ If pupils are staying with host families on trips/exchange visits etc, then staff should ensure that host families are aware of College guidelines.

Financial issues

- ☐ Staff should be very careful in the acceptance of gifts and hospitality from pupils, parents/guardians or prospective parents. Please refer to the Anti Bribery Policy.
- ☐ Undertaking unauthorised paid or unpaid employment during the employee's working hours is not permissible. Please ask your HoD/Deputy Head Academic or Deputy Head Pastoral if you are unsure. (Acting as an examiner is possible but please seek permission first).
- ☐ Fundraising is strictly regulated (see the 'Fundraising Policy' available on the Policy Portal). In order to comply with legal requirements, if someone who wants to give approaches a member of staff, the member of staff must inform the Bursar as soon as possible. A member of staff must not approach or ask a parent(s) or alumnus or Trust for funding unless by arrangement, with prior authorisation. Failure to comply with this may result in disciplinary action being taken.

Transport

- ☐ Staff must ensure they are familiar with the requirements for transporting pupils if required to drive pupils in a Cheltenham College vehicle (see Transport Policy). In this instance they must also read the Welfare on Trips and Whistleblowing policies.
- ☐ Staff should not be using their private vehicle for transporting College pupils, unless in urgent exceptional circumstances and approval has been given by a member of the Senior Leadership Team. Follow guidance in the Transport Policy for vehicle booking or driver request.
- ☐ Staff must not use a mobile phone whilst driving under any circumstances. They must also ensure they do not consume alcohol or any drug that could interfere with their

ability to drive safely (eg medications that could cause drowsiness). This applies to both the use of a Cheltenham College vehicle and personal vehicles that are brought onto site.

Managing Behaviour

- ☐ Always seek to manage behaviour in a calm and controlled manner. Avoid unnecessary or inappropriate physical contact with a pupil. Where it is necessary or appropriate, ensure it is in an open and public environment. If this is not the case – report the circumstances to the Deputy Head Pastoral asap and self-refer using the Low Level Concerns Process (Appendix 1).
- ☐ In areas of school life where contact is more likely such as in House or in sport, do establish the principles of this with pupils in advance and, if needed, with parents/guardians. If unsure, ask a pupil's permission and respect any reluctance expressed.
- ☐ If physical contact is made, for example in reassuring an upset pupil, please report this to the DSL as soon as possible.
- ☐ Any use of reasonable force or physical restraint should comply with College Use of Reasonable Force and Restraint policy and should be reported to the DSL as soon as possible and logged on CPOMS.

Confidentiality

- ☐ Staff should ensure that any confidential information about pupils is treated as such. It should never be used to intimidate, humiliate or embarrass the pupil.
- ☐ Confidential information should never be used casually in conversation or shared with any person other than on a need to know basis. Data Protection guidance should be followed carefully.
- ☐ Any media or legal enquiries should be passed on immediately to Senior Management.
- ☐ If in any doubt about sharing information advice should be sought from a senior manager.

Privacy

Staff should always be mindful of a pupil's privacy, particularly in their own space in house (for example, knocking on a bedroom door prior to opening.)

Fundamental British Values

- a) **Democracy:** Respect for democracy and support for participation in the democratic process.
- b) **The rule of law:** Respect for the basis on which the law is made and applies in England.
- c) **Individual liberty:** Support and respect for the liberties of all within the law.
- d) **Mutual respect:** Support for equality of opportunity for all and respect of others.
- e) **Tolerance:** of different faiths and other beliefs.

Making Professional Judgements

This Code of Conduct provides guidance to staff, however, it is not a complete checklist of what is, or is not appropriate behaviour for adults in all circumstances. The best interests of the child should be foremost in the mind of any adult working at Cheltenham College. If in any doubt about actions you have taken, or might take, you should contact a member of the Senior Leadership Team. Where possible ensure that records exist of decisions, discussions and actions taken.

If you have any concerns at all relating to any of the above or any safeguarding matters in general, then please speak to the DSL or other Senior Member of Staff as soon as possible.

Appendix 1: Low Level Concerns Process (also contained in the Child Protection and Safeguarding Policy)

Introduction

As a community we want to work together to ensure we have an open culture in which it is normal to talk about and reflect on the behaviour of all adults within the community. As part of this we must not shy away from discussing concerns, no matter how small, as this is protective for both children and adults.

To support this aim College has introduced a mechanism for staff to raise any small concerns which might otherwise not be discussed and learnt from.

What is a Low-Level Concern?

Any concern – no matter how small, even if no more than 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 and
- ☐ does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- ☐ relates to their conduct (including outside of work) and which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

The process is intended and designed to ensure colleagues are able to support each other in self-reflection and learning.

When is it a Low Level Concern?

Staff do not need to be completely sure in each case that their concern is a low level concern in order to raise a worry, that determination can be made by the Senior Deputy Head (College) or the DSL in the prep school. However, the information below may act as a guide:

What is an allegation?

Behaviour which indicates that an adult who works with children 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;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

ACTION: report to Head as a matter of urgency.

Examples of such behaviour could include, but are not limited to:

- ☐ being over friendly with children
- ☐ having favourites
- ☐ taking photographs of children on their mobile phone, contrary to school policy
- ☐ engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- ☐ humiliating pupils.

ACTION: report to Head or SDH/DSL as promptly as possible, ideally through:

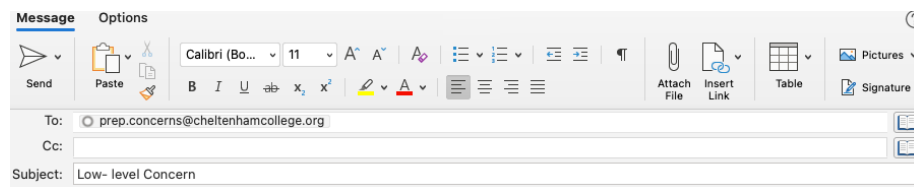
- ☐ concerns@cheltenhamcollege.org (College)
- ☐ prep.concerns@cheltenhamcollege.org (Prep)

Appropriate Conduct

Behaviour which is entirely consistent with the school's Code of Conduct, and the law.
NO ACTION REQUIRED

How to Talk Through or Raise a Low-Level Concern

Please include details of the concern, who it is about, their job role and department if you know it, your name and the date and time in your email.



Message Options

Send Paste

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Attach File Insert Link Table Pictures Signature

To: prep.concerns@cheltenhamcollege.org

Cc:

Subject: Low-level Concern

Details of concern:

Name of staff member:

Department & Role:

Signed:

Time and Date:

Cheltenham College continues to train HoDs, HoSs and HSMs who also provide a listening ear and source of informal advice. Supportive feedback and coaching may come from your Hod, HoS or HSM if a Low Level Concern is raised about you, or you self-refer.

A Supportive and Collaborative Approach

Staff should be reassured that such low level concerns will be dealt with in a sensitive, discreet, and supportive manner which will centre on collaborative working and coaching to enable all colleagues to maintain the ethos and values of the organisation.

College is keenly aware that behaviour outside normal expected standards may indicate that a member of staff is under work or personal pressure and may simply need understanding and support to get through a difficult time. Raising a concern about a colleague in these circumstances will be helpful in ensuring your colleague gets the right help. You will be taking the role of a supportive and critical friend in a way which is protective for your colleague.

Staff should feel confident to self-refer where, for example, they find themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they might consider falls below the expected professional standards. Self-referrals demonstrate effective self-awareness and a desire to learn and improve which is positively encouraged and is protective for everyone.

Low Level Concerns will not be classed as safeguarding concerns unless the DSL determines that they form part of a wider pattern which gives rise to a more serious concern. Where this judged to be the case then the Head and, normally, the LADO will be informed. The SDH/DSL will, as is always the case, work in close partnership with the Head.

In line with the recommendations in KCSIE 2024, Part 4, paragraph 432, Low Level Concerns will be recorded and held outside both the formal Safeguarding records and the employee's formal personnel file. Staff will always have the chance to talk through any concerns raised and give their point of view. They will be given a copy of the record of any Low-Level Concerns before the file is completed so that the record is transparent to them. It may sometimes be the case that the identity of the person raising the report will be anonymised.

In line with Keeping Children safe in Education, the following guidance will be adhered to:

- a. that if the concern has been raised by a third party the SDH/DSL/Head must collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses
- b. reports about supply staff and contractors should be notified to their employers so that any potential patterns of inappropriate behaviour can be identified
- c. that the Head is the ultimate decision-maker and
- d. that record of low-level concerns should be reviewed so that patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified, the school should decide on a course of action. This may be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. The school must consider if any wider cultural issues in school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence

Low Level Concerns will be dealt with in a way which best suits the supportive aims of the process, in most cases this will be a coaching conversation, but it will follow the broad steps set out in the process flow below.

Supporting the Aim of the Process

The aim of this process is to provide a mechanism where we can all feel comfortable to support each other to remain mindful of our duty of care to the children we look after. College will take such steps as may be necessary to ensure that we act as colleagues and use this process fairly. Should it be determined that an internal allegation about a member of staff has been raised with malicious intent, then this will be dealt with through the College disciplinary processes

College Policies

Staff may also wish to refer to the following documents:

The Disciplinary Policy and Procedure

The Capability Policy

The Grievance Policy

The Child Protection and Safeguarding Policy (of which this process is an appendix)

The Whistleblowing Policy

Organisational Self Reflection

It is important that both schools also have the opportunity to review and reflect on low level concerns in a broader way. This may help to identify changes in ways of working which better support our aspirations to function as a safe and supportive community in which both our pupils and our staff enjoy school life and thrive. The SDH/DSL and Head will work in close partnership to ensure there is opportunity for organisational reflection.