



Staff Code of Conduct with Specific Regard to Safeguarding

(Also known as Staff Behaviour Policy)

Including all of the Pre-Prep and Early Years Foundation Stage

DJCF

Updated September 2021

Review and Amendment Record

Date	Person Conducting the Review	Changes Made
1/9/21	DJCF	Fully re-written former Staff Behaviour Policy

OVERVIEW

The purpose of this Code of Conduct is to provide a clear framework within which employees of Summer Fields are expected to conduct themselves – with particular regard to Safeguarding. It is supportive of, and should be read in conjunction with, the school's Safeguarding Policy, which must be read and understood by all members of staff.

Summer Fields fully recognises that it has a duty of care to maintain a working environment for its staff, and a learning environment for its pupils, in which honesty, integrity and respect are reflected in personal behaviour and standards of conduct; where the welfare of pupils is paramount; and where the working environment is safe. In turn, members of staff must recognise that they are each accountable for their own actions. They have a duty not only to keep young people safe but also to protect them from physical and emotional harm.

INTRODUCTION / POSITION OF TRUST

This Code of Conduct applies to all staff employed by the school, as well as those who undertake work for and on behalf of the school. A relationship between an adult and a child is not a relationship between equals. Because of their knowledge, position and/or the authority invested in their role, all adults working in educational settings are in positions of trust in relation to the young people either in their care or in the environment in which they work.

As a boarding school, contact time with pupils at Summer Fields is greatly increased. While this represents one of the most significant benefits of a boarding education, all members of staff must take into account the vulnerability of the pupils living away from home and of members of staff working within this setting. The school bases its expectations upon legality, proportionality and common sense.

It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Members of staff must ensure their relationships with pupils are not of a kind that compromise (or could be perceived to compromise) their professional responsibilities.

GOOD PRACTICE

To meet and maintain our responsibilities towards pupils and employees we need to agree standards of good practice, which form a code of conduct for all members of staff, regardless of their position, employment status or specific department.

Good practice must include:

- Recognising that the welfare of the boys is paramount;
- Treating all boys and colleagues with dignity and respect and ensuring that behaviour, either intentional or unintentional, does not constitute discrimination, bullying or harassment;
- Setting the highest standards of professionalism and personal conduct, recognising that we are each responsible for our own actions;
- Working in an open and transparent way;
- Giving clear and fair management instructions and, as employees, following reasonable rules and instructions given by managers;
- Discussing or taking advice promptly from a line manager or other senior members of staff over any incident, which may give rise to concern;
- Encouraging positive, respectful and safe behaviour among boys at all times;

- Being prepared to listen;
- Being alert to any changes in boys' behaviour, which may indicate that they are having problems;
- Reading and understanding the school's Safeguarding Policy and other policies relating to boys' welfare;
- Reading and understanding the school's Behaviour Policy which includes a summary of the rewards and sanctions programme for all pupils;
- Asking a boy's permission before initiating physical contact, such as assisting with dressing, physical support during PE, during a music lesson or whilst administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between boys and avoiding the use of sexualised or derogatory language;
- Recognising that certain behaviours should never be tolerated or passed off as 'just banter' or 'just having a laugh', as identified in KCSIE 2021 and the school's Safeguarding Policy.
- Adhering to the school's procedures for the use of reasonable force when intervention or restraint of a pupil is necessary in a given circumstance. This can be found in paragraph 5 of the Behaviour Policy; and
- Referring all concerns about a boy's safety and welfare to his tutor, head of year, the Deputy Head Pastoral or, as necessary, to the Headmaster who is the Designated Safeguarding Lead (DSL).

Failure to follow this Code of Conduct may result in disciplinary action being taken, as set out in our Disciplinary Policy.

MAINTAINING PROFESSIONAL BOUNDARIES

All adults should clearly understand the need to maintain appropriate boundaries in their contact with pupils to minimise the possibility of behaviour which might be misinterpreted by others. Any incidents or exchanges that others could misinterpret should be immediately reported and recorded.

Staff contact with other staff should be adult, professional and respectful at all times. Staff should familiarise themselves with the school's Equality and Diversity Policy (both for staff and pupils) which underlines the school's commitment to eliminating unlawful discrimination on the grounds of any of the protected characteristics, and to its commitment to ensure that everyone in the Summer Fields community is treated fairly and equally.

Inevitably, teachers and some other members of staff will need on occasions to have one-to-one contact with boys. In these circumstances they should always ensure that the setting is appropriate and complies with the requirements of this Code of Conduct.

COMMUNICATION WITH PUPILS (including the use of mobile phones and other electronic technology)

All staff mobile phones should be switched to silent while on school premises and should not be used in front of pupils – for instance in school corridors or class rooms. The staff room, or private accommodation, are appropriate places to make or receive calls and other messages. As detailed in the school Safeguarding Policy, mobile phones are not permitted in the EYFS or in any area where EYFS children are present.

Communication between pupils and staff, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, emails, digital cameras, videos, web-cams, websites, social networking sites, online gaming and blogs.

Staff should not share any personal information with a pupil. They should not request, or respond to, any personal information from the pupil, other than that which might be appropriate as part of their professional role. Staff should ensure that all communications are transparent and open to scrutiny.

Staff should also be careful in their communications with pupils so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming. They should not give their personal contact details to pupils including home email, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents. Email or text communications between a staff member and a pupil outside agreed protocols may lead to disciplinary action. This also includes communications through internet-based websites, such as social networking, instant messaging or gaming.

Staff must deny current, or past pupils who are still at their senior school, any access to their personal online profiles. Communication with former pupils who are over 19 years old is left to staff discretion. However, be conscious of the fact that former pupils may be in contact with or related to current pupils.

Similarly, all communication with parents must be via the school email system or telephone or face-to-face. Personal email, social media, WhatsApp, personal text, etc. should not be used.

PHOTOS AND VIDEOS

Many school activities involve recording images. Such activities may be undertaken as part of the curriculum, at sporting, musical and other co-curricular events, during out-of-school activities, for publicity or to celebrate achievement, for instance on internal displays or the school's website..

Under the school's Parent Contract, the school is allowed to use images of boys for the purpose of publicity. However, images should not be displayed on other websites, in publications or in a public place without the permission of the Headmaster and additional parental consent. Special care should be taken when photographing boys in the boarding house, and the appropriate use of any such images.

Staff should not have images of pupils stored on personal cameras, devices or home computers. Any images taken on such devices should be downloaded to the school system as soon as possible and deleted from the personal device. There should be a reasonable justification for storing any such images on school equipment too.

Under no circumstances should adults in the school access inappropriate images on the internet. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material is illegal.

Staff must read and sign the school's ICT Acceptable Use Policy for staff and also be familiar with the school's Taking and Storing of Images Policy.

SOCIAL NETWORKING SITES AND ONLINE GAMING

Summer Fields staff may use social networking for personal use. However, the school requires that the profile and any photos of the member of staff remain 'locked down' as private so that boys or parents do not have access to personal data or images. Any and all activity on social media sites should not bring the school into disrepute. In the event that activity is deemed as bringing the reputation of the school into disrepute, action may be taken under the school's Disciplinary Policy.

Staff should be aware that they leave themselves open to a charge of professional misconduct if images of staff in a compromising situation are made available by anyone on a public profile. If a pupil does gain access to the profile of a member of staff by fraudulent means (impersonation or hacking), senior management should be informed immediately.

Outside of the context of academic study or formal extra-curricular school activities, staff should not seek out boys and/or share their own gamer tags/ID with boys, or use school equipment to play online games. Similarly, as soon as a member of staff becomes aware that they are in an online game with a boy currently at the school, they should cease to play against that pupil and should not enter any games containing that player as part of the group.

Staff must deny current or past pupils who are under the age of 19, or have not yet left their senior school, any access to their personal online profiles.

Where relationships exist between staff and those who are parents at the school, or personal friends who are parents at the school, social networking is acceptable but caution must be exercised so that professional standards are maintained and members of staff do not compromise themselves or the school. This same caution should apply to online communications with past pupils of the school, who must anyway be at least over 18, and have left school, for that communication to take place.

Staff are advised to report any inadvertent online contact with current or recent boys to the DSL to ensure full transparency is maintained.

SOCIAL CONTACT

Staff should not establish (or seek to establish) social contact with pupils for securing a friendship or to pursue or strengthen a relationship. If a boy or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in making a response and ensure that someone in senior management is aware.

There will be occasions when there are social contacts between boys and staff, where for example the parent and member of staff know each other within a social environment. These contacts, however, will be easily recognised and openly acknowledged.

THE USE OF PERSONAL LIVING SPACE

No boy should ever be invited into the home or personal living space of an adult who works with them, whether teacher or non-teacher. This applies in all cases, including both individual meetings and group get-togethers. In a very few, exceptional circumstances, permission may be given by the Headmaster or Operations Director for such group meetings, but the rationale and reason will need to be clearly established in advance.

ONE-TO-ONE CONTACT

One-to-one contact is inevitable in a school context and in a boarding school the potential for such contact is increased. While it is a significant benefit of a boarding education, the school also recognises that one-to-one contact between a pupil and a member of staff provides the potential for risk in respect of both parties; staff working in one-to-one situations with children are more vulnerable to allegations. All members of staff should therefore exercise common sense and make suitable judgements about their behaviour in a one-to-one situation.

There are frequent occasions when staff may need to talk to or teach a child one-to-one: tutorials; music, some sport and learning support lessons; or before or after a lesson. If such an encounter is indoors, members of staff should always ensure that they are visible – either through a glass panel such as are fitted in most rooms in the school, or by leaving a door open. If the meeting is in a building that is otherwise unoccupied, they should arrange to meet in a different location.

Staff should refer to the Covid-19 Annex to the Safeguarding Policy for further information about one-to-one online teaching and contact during lockdown or a period of remote learning.

Pre-arranged meetings with boys away from the school premises are not permitted, unless specific approval has been sought from a relevant member of the senior management team and/or the child's parent.

GROOMING

All staff should be aware that persons intent on sexual abuse of children groom both children and adults around them. This is to ensure that they can carry out their abusive behaviour without raising anybody's suspicion or making other people scared to blow the whistle on them.

It is important that staff do not behave in a way that could be misinterpreted, leaving themselves open to suspicion. Managing relationships within (and especially outside) of school in line with this policy should minimise the risks of any such misunderstandings occurring.

PHYSICAL CONTACT

There are occasions when it is entirely appropriate and proper for members of staff to have physical contact with boys. This may be to comfort a distressed child, to demonstrate a sporting or music technique or, in appropriate circumstances, to provide restraint.

It is crucial that this contact is carried out in a manner that is appropriate to the staff member's professional role. When staff make physical contact with a pupil, this should be in response to their needs at the time, be of limited duration, be appropriate and proportionate, and take place in an open environment; the pupil's age should be taken into consideration. Staff should use their professional judgement at all times about the appropriateness of any physical contact and should be sensitive to any discomfort expressed verbally or non-verbally by the pupil.

Where a member of staff has a particular concern about the need to provide this type of care, they should seek further advice from a senior colleague. They should also record any such situations which may give rise to concern with their line manager or with the DSL.

Physical contact that occurs regularly with an individual boy, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to pupils with a physical disability). Any such contact should be the subject of an agreed and open policy, but also subject to review.

On occasion, it may be necessary for a member of staff to intervene, using reasonable force, to restrain a pupil. Staff may legitimately intervene to prevent a pupil from committing a criminal offence; injuring themselves or others; causing damage to property, or engaging in behaviour prejudicial to good order and discipline in the school. Staff should have regard to the health and safety of themselves and others.

There is no legal definition of reasonable force, but it must be proportionate to the behaviour of the pupil and the seriousness of the potential harm prevented; and must be the minimum needed. Force cannot be justified to prevent a pupil from committing a trivial misdemeanour. Under no circumstances should physical force be used as a form of punishment. In all cases where physical intervention is deemed necessary, the incident and subsequent actions should be recorded and reported.

Members of staff should refer to the school's Behaviour Policy, paragraph 5, for information about the procedures for using reasonable force.

Physical contact should never be secretive or for the gratification of the staff member, or represent an abuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be declared immediately to a senior staff member or to the DSL.

TRANSPORTING PUPILS

Members of staff should never transport pupils in private vehicles or on a one-to-one basis, unless in an emergency or circumstances make this absolutely unavoidable: for example a member of the medical team taking a boy to hospital. By and large, any visits to A & E should be made by taxi; the school operates a termly rota system so that a member of staff is always available out of hours to accompany a pupil to hospital by taxi.

In certain situations, for example out of school activities, away matches, etc., staff may agree to transport boys. This should always be in a school minibus or 9-seater transport provided by the school, with one designated driver and any escort as appropriate for the ratio of boys to staff. Private cars should not be used.

Where a medical or other emergency necessitates the use of a private car, the vehicle must be roadworthy, taxed and insured, and the driver must be a member of staff and be registered on the school's list of approved drivers. Where possible, prior permission should be sought.

Staff should refer to the school's External Visits Safety and Supervision Policy and Minibus Usage Policy for further information.

EXTRA-CURRICULAR ACTIVITIES

Staff should take particular care when supervising boys in the less formal atmosphere of a residential trip away from school, or any other extracurricular activity, or as part of an activity which takes place during the school day but away from school. Members of staff must adhere to the guidance in the school's External Visits Safety and Supervision Policy, and to any risk assessments on *Evo/ve*, for all school trips and expeditions, as well as all off-site activities.

BEHAVIOUR MANAGEMENT

All pupils have the right to be treated with respect and dignity. Staff should not use any form of degrading treatment to punish a pupil. The use of humour can help to defuse a situation, but the use of sarcasm, or demeaning or insensitive comments toward a pupil is never acceptable. Force should never be used as a form of punishment.

FAVOURITISM

Staff should exercise care when selecting boys for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when boys are excluded from an activity. Methods of selection and exclusion should always be subject to clear and agreed criteria and not be used as a tool for humiliation which could be perceived as abusive.

INFATUATION

Occasionally, a boy may develop an infatuation with an adult member of staff. Staff members should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. However, they should remain aware that such infatuations carry a high risk of words or actions being misinterpreted.

Therefore members of staff should make every effort to ensure that their own behaviour is above reproach. They should discuss this situation at the earliest opportunity with a senior colleague so that appropriate action can be taken.

CHANGING CLOTHES AND SHOWERING

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.

Any supervision should be appropriate and the needs and age of the pupils concerned should be taken into account with sensitivity to the potential for embarrassment. This might include avoiding any visually intrusive behaviour where pupils are changing or offering sensitive boys an opportunity to change privately. Mobile telephones with cameras should always be left elsewhere or securely in a pocket during such times.

THE LEGAL POSITION ON SEXUAL CONTACT WITH PUPILS

Members of staff should understand that under the Sexual Offences Act 2003 it is a criminal offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil at Summer Fields is illegal and, if convicted of such an offence, a person is likely to serve a custodial sentence and have their name added to the sex offender register, which would bar them from working with children again. Likewise, a member of staff should not pursue a sexual relationship with any young person under the age of 18 outside of school either.

This offence has nothing to do with the legal age of consent; it deals specifically with the abuse of a position of trust, whatever the age of the pupil. This means that the young person's consent is not the issue which determines whether an offence has been committed. The legal definition of a child for this purpose is a person under the age of 18.

The sexual activity referred to is not exclusively physical contact including penetrative and non-penetrative acts. It may also involve other activities, such as causing children to engage in or watch sexual activity through the sending of explicit sexual images, emails and texts, or the production of pornography.

CONFIDENTIALITY AND DATA PROTECTION

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information. They should never use confidential or personal information about a pupil or their family for their own or others' advantage. Information must never be used to intimidate, humiliate or embarrass a pupil. Care should be taken not to share confidential information about a pupil in casual conversation.

Staff should familiarise themselves with the school's Data Protection Policy which defines how the school will meet its obligations with regards to personal data, as required by the Data Protection Act 2018 (the '2018 Act') and the EU General Data Protection Regulation ('GDPR'). They should also familiarise themselves with the school's various Privacy Notices as relevant to their role.

From time to time during the course of their employment, staff may be privy to information of a confidential or sensitive nature. Under no circumstances should staff disclose this information to a third party or provide them with documentary evidence of a confidential nature. Should this rule be broken, it may be considered gross misconduct and result in termination of employment in line with the school's Disciplinary Policy.

WHISTLEBLOWING (Public Interest Disclosure)

Staff have a right and a duty to raise concerns (in other words, 'to blow the whistle') about any suspected breaches of the law or wrongdoing by the school or any of its employees. This could include suspected cases of fraud, breaches of Health & Safety law, safeguarding concerns and/or any other criminal activity. Further information can be found in the school's Whistleblowing Policy.

Whistleblowing legislation does not cover personal grievances.

Members of staff who feel obliged to make a disclosure, will be treated as having done so in good faith and will not be victimised for raising their concerns, even if they later turn out not to be true.

GIFTS AND REWARDS

Summer Fields has an Anti-Bribery and Corruption Policy (based on the Bribery Act 2010) and all staff receive regular reminders from the Finance Director – 'Gifts and Hospitality; Disclosure and tax status' – which contains clear guidance regarding arrangements for the declarations of gifts received. Staff need to take care that they do not accept any gift, personal payment or other incentive (such as secondary employment) that might be construed as a bribe by others, or lead the giver to expect any form of preferential treatment. There are occasions when boys or parents wish to give tokens of appreciation to staff, for example at Christmas or as a thank-you, and this is acceptable. However, it is unwise to receive gifts on a regular basis or of any significant value.

Any member of staff concerned about whether they or their colleagues may be at risk of giving or receiving a bribe (financial or otherwise) should contact the Finance Director. Any member of staff receiving gifts or entertainment valued at more than £100 should disclose this using the school's online 'Register of Gifts and Hospitality'.

Members of staff should not give personal gifts to pupils. It is acceptable for staff to offer prizes of small value in certain tasks or competitions.

Any member of staff offered paid employment by a parent, either in term-time or the holidays, should always seek advice from the Headmaster.

DRESS AND APPEARANCE

Staff should ensure that their appearance and clothing promotes a positive, smart and professional image and is appropriate to their professional role. We expect pupils to look smart in their school uniform. Staff should ensure they are dressed decently, safely and appropriately. They should ensure that their dress is not likely to be viewed by others, including visitors, as offensive, revealing or provocative; that it does not distract, nor cause embarrassment or give rise to misunderstanding.

ALCOHOL, RECREATIONAL DRUGS AND OTHER SUBSTANCE ABUSE

Summer Fields wishes to promote the health and wellbeing of employees and minimise problems at work arising from the effects of alcohol, drugs (whether prescribed or recreational), solvents, etc. These elements are covered in the school's Alcohol and Drugs Policy for staff. The taking of recreational drugs during working hours is unacceptable and will not be tolerated. All employees are expected to attend work without being under the influence of alcohol or recreational drugs and without their performance being adversely impacted by the consumption of alcohol or recreational drugs.

Employees taking prescribed medication are required to advise their manager if these are likely to impact on their duties, in particular their ability to drive and/or use equipment required by their role. Employees whose performance or behaviour falls below the acceptable standard, or who cause danger or disruption because of alcohol, drug or other substance misuse, may be the subject of disciplinary action.

Where there are reasonable grounds to suspect that an employee is under the influence of alcohol or drugs on reporting for work or during the course of work, the school reserves the right to take any necessary action; steps will always be taken to ensure that the policy is not used in a discriminatory manner against any employee and that it targets no individual unfairly.

SMOKING

In order to promote a healthy and pleasant working environment, and because of the fire risk, members of staff may not smoke on school premises, indoors or outdoors, at any time (except in the designated smoking area). Members of staff should never smoke in the presence of pupils, wherever they may be.

CONDUCT OUTSIDE OF WORK

The school does not concern itself with the private lives of its staff, unless they affect its effective operation or its reputation. Any employee who demonstrates unlawful or anti-social behaviour or who conduct themselves in a way that may jeopardise the school's reputation or position, may be dealt with under the disciplinary procedure. In particular, a member of staff accused of a criminal offence is expected to inform the school at the earliest opportunity. Failure to do so may be a disciplinary offence.

During their employment at the school, members of staff must disclose any criminal offences with which they are charged or cautions they receive. Staff who live in school accommodation are also required to inform the school about any criminal or safeguarding matters which involve members of their household.

Members of staff will not act in a way that would bring the school or teaching profession into disrepute. This covers relevant criminal offences, such as violence or sexual misconduct, as well as negative or inappropriate comments about the school on social media or in any public capacity.

BREACHES OF THIS CODE OF CONDUCT

This Code of Conduct is not exhaustive. If situations arise, which this code does not cover, the school expects members of staff not only to use their professional judgement but also to act in the best interests of the school and its pupils.

Any breaches of this code will be dealt with in accordance with the relevant policies and procedures, which might include the school's Disciplinary Policy. Any member of staff, who has a concern or is unsure about an event that has arisen, should discuss the matter with a senior colleague or the DSL, as appropriate, as soon as possible.

REVIEW

The School will review this Code of Conduct on an annual basis and in the event of any new developments in employment or child protection legislation or guidance. It is not a contractual document and can be amended at any time.

ANNEX – LOW LEVEL CONCERNS

This annex is a duplicate of the school's Low Level Concerns Policy, which can also be found in the Safeguarding Policy.

Introduction

Concerns may arise in several different ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Summer Fields adopts a whole-school approach to safeguarding and actively promotes, and seeks to ensure, an open, transparent and trusting culture in which the school's values and behavioural expectations are constantly lived, monitored and reinforced by all staff. All concerns about any adult working in any capacity (employed or voluntary) on behalf of the school will be dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including those concerns which do not meet the 'harms threshold' or 'harms test', as laid out in *Keeping Children Safe in Education 2021*, Part 4, Section 1) are shared responsibly with the correct person, recorded and dealt with appropriately, is critical.

This should encourage an open and transparent culture and enable the school to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the school are clear about professional boundaries and the ethos and values of the school. It should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

What is a Low Level Concern?

The term 'low level concern' does not mean that it is insignificant, rather that the behaviour towards a child does not meet the 'harms threshold' or 'harms test' as set out in *KCSIE 2021*, Part 4, Section 1. 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 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of low level concerns could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their own 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. Any such concern (including those that do not meet the 'harm threshold' in *KCSIE 2021*, Part 4, Section 1) should be shared with the headmaster (see below).

Summer Fields aims to:

- ensure that all staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others;
- empower staff to share any low level safeguarding concerns with the headmaster;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weakness in the school's safeguarding procedures.

Sharing Low Level Concerns

Low level concerns about any member of staff should be reported to the headmaster.

Summer Fields seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Where a low level concern relates to a person employed by an agency or contractor, that concern should still be shared with the headmaster and recorded in accordance with the school's low level concerns policy. The headmaster should also inform the employer about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Responding to Low Level Concerns

Concerns about safeguarding should be reported to the headmaster. If the concern has been raised by a third party, the headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously; and
- to the individual involved and any witnesses.

The information collected will help the headmaster to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for any decisions and action taken.

Recording Low Level Concerns

All low level concerns should be recorded in writing by the headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.

The school must keep these records confidential, and held securely in compliance with the [Data Protection Act 2018](#) and the [UK General Data Protection Regulation \(UK GDPR\)](#).

Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the 'harms threshold', in which case it will be referred to the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again. The school will retain information on low level concerns at least until the individual leaves its employment.

References

Only substantiated safeguarding allegations will be included in staff references. Low level concerns will not be included unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Low level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Further information on the management of low level concerns may be found in the updated document:

[Developing and implementing a low-level concerns policy: A guide for organisations which work with children \(Farrer & Co, 2021\)](#)