

Staff Code of Conduct

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Version	Changes from Previous Version	Date Adopted	Next Review and Update
Version 1.0		April 2024	August 2024
Version 2.0	<i>Updated references to KSCIE 2024 Addition of Appendix A and Appendix B</i>	September 2024	August 2025

This Staff Code of Conduct will be reviewed annually in line with national and local requirements and recommendation (for example, annual updates to Keeping Children Safe in Education).



Commitment to Equality

St Teresa of Calcutta Multi Academy Company (referred to as 'the MAC' within this document) is committed to providing a positive working environment which is free from prejudice, unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard. We do not discriminate against any child or adult on the grounds of race, disability, gender, age, gender reassignment, religion/belief, pregnancy and maternity, sex or sexual orientation, marriage/civil partnership. We embrace the individuality of all our community members and comply fully with the Equality Act 2010.

1.0 Introduction

As an employer, St Teresa of Calcutta MAC is required to set out a Code of Conduct for all staff.

As a Catholic Multi Academy Company, all adults within our MAC are expected to actively follow and live out our values which reflects how the MAC family is to conduct itself at all times. All communication and interaction between members of the MAC family – directors, local governing body members, staff, pupils, parents, carers and visitors must reflect our values.

As part of the Catholic Education Service terms and conditions, staff are expected to be conscientious and loyal to the aims and objectives of the MAC.

In addition, staff are required to develop and maintain the Catholic character of the MAC. Staff are to have regard to the Catholic character of the MAC and not do anything in any way detrimental or prejudicial to the interests of the same at any time, at work or at home.

This Policy is produced with reference to Keeping Children Safe in Education (Sept. 2023).

This Policy is applicable and relevant to all staff, both teaching and support, fixed term, part and full-time employed by the MAC as well as those who work in any casual, or voluntary, unpaid capacity.

All teachers employed by St Teresa of Calcutta MAC, irrespective of whether they have a permanent or temporary contract or are employed on a full or part time basis, have a statutory obligation to adhere to the National Teachers' Standards (2013 revision, Dec 2021 update) and in relation to this policy, Part 2 of the Standards-Personal & Professional Conduct.

Part 2 of the Standards states that teachers are expected to demonstrate consistently high standards of personal and professional conduct. In the MAC these standards will apply to all staff, both teaching staff and non teaching staff. This means all staff are expected to uphold public trust 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 their position.
- Having regard for the need to safeguard pupil's 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 pupil's vulnerability or might lead them to break the law.

Staff must have proper and professional regard for the ethos, policies and practices of the MAC/school and maintain high standards in their own attendance and punctuality.

Staff must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

2.0 Expectations of Staff Behaviour

The following general standards are required by all staff:

- Staff should behave in a respectful, professional and polite manner and ensure their behaviour does not breach the Equality Act 2010.

- Staff should comply with all reasonable management instructions.
- Staff should cooperate fully with colleagues, line managers and school leaders.
- Staff should uphold and further the MAC's positive public image at all times.
- Staff should ensure appropriate standards of performance are maintained at all times.
- MAC policies and procedures, and individual school policies and procedures, should be adhered to at all times.

All staff will be expected to act in accordance with this Code of Conduct and should be aware that any breach or failure to follow the policy could result in disciplinary action being taken against them, including dismissal and referral to statutory authorities, (including the LADO, the Police & the DBS), and if a teacher, referral to the Teacher Regulation Agency (TRA).

The Disqualification under the Childcare Act 2006 (Regulations 2018) states that schools should make clear their expectation that staff should disclose any relationship or association (in the real world or online) that may impact on the school's ability to safeguard pupils, and therefore, we request staff to be open about their relationships which may impact safeguarding at our schools so appropriate safeguards can be put in place to minimise any potential risk posed to pupils.

This applies to all staff, not just those in early or later years' childcare. However, also in accordance with these regulations St Teresa of Calcutta MAC will not ask intrusive questions of staff regarding those with whom they live or have relationships/associations.

All staff will be given a copy of the Staff Code of Conduct at the start of the academic year. All new staff will be taken through the policy as part of the staff induction programme.

3.0 Principles

- Staff are responsible for their own actions and accountable for how they use their authority and position of trust.
- Staff must treat all members of the MAC community (pupils, colleagues, parents and visitors) with consideration & respect.
- Staff must demonstrate a clear understanding of and commitment to non-discriminatory practice.
- All staff have a duty of care to keep pupils safe, recognising that safeguarding is everyone's responsibility.
- Staff should ensure that they are seen to work in a transparent way.
- Staff must report matters of concern at the earliest opportunity to the appropriate member of staff.

4.0 Setting an Example

All staff who work in St Teresa of Calcutta MAC must set positive examples of behaviour and conduct which can be copied by the pupils. All staff must demonstrate high standards of conduct in order to engage the pupils to do the same. As a result, staff must:

- Ensure that their relationships with fellow staff and pupils are always conducted in a courteous and professional manner.
- Not use abusive or inappropriate language (homophobic, racist or gender stereotyping).
- Never make personal comments which will humiliate or scapegoat pupils or other members of staff.
- Ensure that they do not censure or criticise the work of other staff in the hearing of pupils or

parents. The criticism of the work of staff by other staff should always be undertaken professionally, constructively and in the appropriate setting.

- Observe the highest standards of dress, behaviour, attendance and punctuality. Staff should not do anything that prevents them from carrying out their role properly and efficiently whether on MAC or school premises or on MAC related business taking place away from a school site or the central office.

5.0 Staff Attire

During working/school hours staff must ensure they are dressed decently, safely and appropriately for the tasks they undertake. It is important that all staff promote a positive professional image with regard to appearance and standards of dress at all times. Where uniforms are provided, these must be worn at all times whilst at work and laundered on a regular basis.

On non-uniform or training days, casual dress may be authorised. Whilst we wish you to be comfortable, staff must continue to wear appropriate attire that is suitable for the working environment.

6.0 Safeguarding Pupils

All staff have a duty of care towards all pupils at all times when on a school site irrespective of whether or not they are directly supervising the pupils.

Staff who have reason to believe that a student may be the victim of emotional, physical or sexual abuse or neglect must report their concerns to the School's Designated Safeguarding Lead (DSL) at the earliest opportunity following the procedures as outlined in the school's Safeguarding Policy (including Child Protection).

Staff must be aware of their responsibilities as stated in the MAC/school's Safeguarding and Child Protection policy and Whistleblowing Policy.

7.0 Confidentiality

Where staff have access to confidential information about pupils, parents, carers or other members of staff they must not disclose or reveal such information except to those colleagues who have a professional role in relation to the pupil/member of staff.

=Staff have an obligation to share with the school's Designated Safeguarding Lead any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not act on information that they are told by the pupil. The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk

Staff must be aware that the information held on the MAC's/school's information system about pupils and other staff is strictly confidential and every effort must be made to ensure that it is not inappropriately disclosed and/or shared.

To ensure confidentiality, after using the MAC computer network, staff must always either lock or log out from the computer being used.

The storing and processing of personal information is governed by the General Data Protection Regulations 2017 (GDPR) and Data Protection Act 2018. Staff must follow the MAC/Schools Data Protection Policy which clearly defines their responsibilities under this legislation so that, when considering sharing confidential

information, those principles apply.

Staff must not use the MAC/school ICT network if they have not submitted a signed copy of the MAC Acceptable User Agreement for IT.

8.0 One-to-One Situations

Staff are more vulnerable to accusations when alone with a pupil and/or parents and should avoid such situations where possible.

Where undertaking one to one situations with pupils and/or parents, staff must:

- Leave the door to the room being used open or undertake the meeting where they can be seen (making use of the school's CCTV system if applicable).
- Ensure that a colleague is aware that the meeting is taking place.
- End the meeting if the pupil or parents become agitated, threatening etc.
- Never arrange to meet a pupil and/or parents away from the school site unless permission has been given by the Head Teacher.
- Avoid travelling in a car with one pupil unless permission has been received from the Head Teacher to do so. In the unavoidable event where a member of staff has permission from the Head Teacher to travel in a car with a single student, the member of staff should be accompanied by another member of staff.

Staff must never have one-to-one meetings on their own where there are known concerns with a pupil and/or parents, or where the meeting is being held to address challenging or difficult matters.

9.0 Safeguarding Concern or an Allegation Against a Staff Member

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then;

- This should be referred to the CSEL for the Central Team and Head Teacher in a school.
- Where there are concerns about the CSEL, this should be referred to the Chair of the Board.
- Where there are concerns about a Head Teacher, this should be referred to the CSEL.
- In the event of concerns/allegations about the CSEL or Head Teacher, where there is a conflict of interest in reporting the matter to the Chair of the Board or CSEL, this should be reported directly to the LADO.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the low-level concerns procedure as outlined in section 4.4 of this Staff Code of Conduct.

10.0 Low Level Concerns

As part of our MAC-wide approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the MAC/School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

All concerns about adults including allegations that do not meet the harms threshold (see KCSIE 2024 Part 4, Paragraph 430- 452) are shared responsibly and with the right person, recorded and dealt with appropriately. We encourage an open and transparent culture; to enable staff to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the MAC/schools are clear about professional boundaries and act within these boundaries, and in accordance with

the ethos and values of the MAC/schools.

All staff are expected to be aware of the MAC's Low Level Concern Policy and act in accordance with the Policy. (A copy of the MAC's Low Level Concern Policy can be found in Appendix A)

11.0 Honesty and Integrity

Staff must maintain high standards of honesty and integrity in their work. This particularly includes the handling and claiming of money and the use of company facilities, property and resources.

12.0 Dealing With Money

Staff must ensure that public funds are used in a responsible and lawful manner, in accordance with MAC procedures and the Academy Trust Handbook.

13.0 Bribery, Gifts and Hospitality

All staff should ensure that they comply with the guidance as set out in the Gifts and Hospitality policy.

14.0 Communicating With Pupils

Staff must never use their personal private e-mail address or personal private mobile telephone number to communicate with pupils. All electronic communication with pupils must be from the member of staff's MAC/school e-mail account or the MAC/school's virtual learning environment or by using a company/school provided mobile telephone.

Staff must not have pupils as "friends" on any social network which they may use and should take every possible precaution to ensure that their privacy settings are at the highest possible setting.

Staff must exercise extreme caution and professional judgement in deciding whether to have former pupils as "friends" on any social network which they use.

Staff should refer to the MAC Online Safety Policy including MAC Staff ICT Acceptable Use Policy for further guidance. (A copy of the MAC's Online Safety Policy including MAC Staff ICT Acceptable Use Policy can be found in Appendix B)

15.0 Physical Contact and Restraint of Pupils

The use of unwarranted physical force against a pupil is likely to constitute a criminal offence. There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that can involve a degree of physical contact to control or restrain a pupil. This can range from guiding a pupil to safety by the arm, to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either a passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of a classroom.

The use of physical intervention should be avoided if at all possible, however, by law, teaching staff, and other staff who are authorised to have control or charge of pupils may use such force or physical contact as is reasonable and proportionate in the circumstances to prevent a pupil from doing or continuing to do any of the following:

- Committing a criminal offence.

- Injuring themselves or others.
- Causing damage to property, including their own.
- Engaging in any behaviour prejudicial to good order and behaviour at the school or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

Consideration must be taken of the risks presented by incidents involving children with SEND, mental health problems or with medical conditions owing to their additional vulnerability and reasonable adjustments made, where appropriate, as outlined in KCSIE, Sep 2023, para 165 and the DfE document, Use of Reasonable Force, July 2013.

Where school staff have been, for example, MAPA or Team Teach trained, then it would be preferable for such staff to deal with incidents requiring reasonable force, however, this may not be possible, therefore, consideration of the pupil's safety and the decision on whether or not to use reasonable force to control or restrain a pupil is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances.

Any incidents of restraint must be reported to the Head Teacher for logging (via the school's electronic system).

Any concerns about an instance of physical contact between a member of staff and pupil must be reported to the Head Teacher or Deputy Head Teacher at the earliest opportunity.

16.0 Conduct Outside of Work

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

Staff may undertake work outside the MAC/school, either paid or voluntary, provided that it does not conflict with the interests of the MAC/school nor be at a level which will affect the member of staff's work performance. Staff undertaking additional employment must not use company time or equipment for that purpose without the prior and express permission of the CSEL/Head Teacher.

Staff should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model.
- Make, or encourage others to make sexual remarks to, or about, a pupil.
- Use inappropriate language to, or in the presence of students, discuss their personal or sexual relationships with, or in the presence of students.
- Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.
- The responsibility to maintain public confidence and not to bring St Teresa of Calcutta MAC into disrepute also extends to standards of behaviour outside of school. All employees should ensure they behave in a way that befits the high status of their profession.
- Reports of public disorder, impropriety and behaviour which has the potential to cause the MAC reputational damage, could all be grounds for disciplinary action in line with the St Teresa of Calcutta MAC Disciplinary Policy and Procedure.

In addition to the above, all teachers are required to uphold the Teacher Standards, Part A and Part B, at all times.

Whilst we do not intend to restrict outside activities, it is important to remember that activities whether during or outside of working hours which result in reputational damage for the MAC, or which cause us to lose faith in your integrity, may result in disciplinary action.

Staff should avoid unnecessary contact with pupils outside of school and must maintain a professional approach and distance if they find themselves in a social setting where students are present. Staff must:

- Never give pupils details of their home address, home telephone number, mobile telephone number or personal e-mail address.
- Never make arrangements to meet pupils, individually or in groups, unless permission to do so has been received from the Head Teacher for a school-related activity.
- Never invite pupils, individually or in groups to their home.
- Never transport pupils, individually or in groups, in their own vehicle unless permission to do so has been received from the Head Teacher. And in accordance with the OEAP National Guidance 'Transport In Private cars' (updated March 2023).

School staff must notify their Head Teacher, and at the earliest possible opportunity if charged with, or convicted of, any criminal offence, or if they accept a formal police caution. MAC Central Office staff must notify the CSEL at the earliest possible opportunity. In cases concerning the Head Teacher themselves, they must notify the CSEL at the earliest possible opportunity. In cases concerning the CSEL, the CSEL must notify the Chair of the Board of Directors at the earliest possible opportunity.

The MAC acknowledges that a caution is not a criminal conviction, but staff must be aware that cautions have to be declared during Disclosure & Barring checks unless they meet the filtering rules of the Disclosure & Barring Service.

Criminal offences that involve violence or inappropriate financial activity or the use of illegal drugs or sexual misconduct are likely to be regarded as incompatible with that person working in an education/ school setting. Such behaviours are likely to result in the member of staff's dismissal and for teachers a prohibition order.

The MAC acknowledges that a member of staff charged with an offence is innocent until proven guilty, however, special considerations will apply if the offence is relevant to safeguarding.

Staff must exercise extreme caution when using all forms of information technology and social media (Facebook, Instagram, Twitter etc.) and be aware of the risks to themselves and others. Staff should have privacy controls set at the highest possible setting and must not engage in the inappropriate use of social network sites in a manner which may bring themselves, the MAC, the school or school community into disrepute. In line with the MAC Staff ICT Acceptable Use policies, staff must remember that:

- Anything posted online is potentially public and permanent.
- That the privacy settings of their "friends" may not be as secure as their own.
- It is always necessary to use "strong" passwords that contain a mixture of upper & lower case letters, numbers and symbols.

17.0 Attendance and Timekeeping

- Staff contracts of employment contain the main terms and conditions of their employment with the MAC.
- Staff must follow the Central Team/each school's requirements for reporting absence due to sickness.
- Staff should be present and ready to start work in line with their contractual working hours.
- Staff must also remain in the workplace and continue to work until they have completed their contractual working hours.

18.0 Signing In and Out and Staff ID

Staff must follow the signing in and out procedures in operation in their school or the Central Team. A St Teresa of Calcutta MAC or School lanyard must be worn at all times on MAC/school premises.

19.0 Communications

Staff should have their personal mobile and other smart devices either switched off, or in silent mode, during working hours. Discretion should be exercised when using a personal mobile device and any use must not cause a distraction from work for the employee themselves or their colleagues. Personal calls and text messages should not be made during working hours; they should only be made during lunch or other breaks. Staff should obtain authorisation from their line manager if they need to make or receive an urgent personal phone call. In addition, it is forbidden to:

- give personal phone numbers or home phone numbers to pupils / parents etc.
- take pictures of pupils / colleagues, company premises, customers or clients using personal mobile devices.
- transfer files via Bluetooth or other insecure mobile networks.

20.0 Alcohol, Illegal Substances and Medication

The MAC accepts that alcohol is legally and freely available and acknowledges that some illegal substances are also readily obtainable. Staff are not expected to use illegal substances. Staff must ensure that the use of alcohol out of working hours does not adversely affect their work performance, and that, in accordance with their obligations under health and safety legislation, they take reasonable care of the health and safety of themselves and others whilst at work. MAC schools and Central Team are alcohol and illicit substance free establishments. The MAC will not accept employees arriving at work under the influence of alcohol or illicit drugs and whose ability is impaired in any way by reason of the consumption of alcohol or illicit drugs. Neither alcohol nor illicit drugs should be consumed on MAC premises. Staff should have regard to the expectation that they will not bring the MAC into disrepute.

Staff who are prescribed a type of medication which they have not taken before should make themselves aware of possible side-effects. In accordance with their duty to take reasonable care of their own and their colleagues' health and safety, they should advise the MAC if the medication starts to affect their ability to do their job or travel safely to work, or if there is a likelihood that this will happen. The MAC or school would undertake risk assessments and take occupational or other specialist advice as appropriate.

21.0 Smoking and Vaping

All MAC schools are non-smoking educational establishments. No-one is permitted to smoke or vape in the buildings or on the sites at any time.

22.0 Use of MAC Premises or Facilities

Staff must not use the MAC/school's premises or facilities for activities that are not connected with their employment at the school without express prior written agreement from the Head Teacher/Local Governing Body or CSEL/Directors. This includes the personal use of school email, telephones, computers, photocopiers or other equipment.

23.0 Health and Safety

Staff must ensure that they follow the procedures relating to health and safety as set out in the relevant Health and Safety Policies.

24.0 Personal Property

Staff are solely responsible for the safety of their personal possessions on MAC/school premises and should ensure that their personal possessions are kept in a safe place at all times. The MAC/schools accepts no responsibility for vehicles parked on MAC/school premises.

25.0 Publications and Contact with the Media

Employees must not make comments to the press or other media, including social networking sites, on behalf of the MAC/school unless specifically authorised to do so by the CSEL. Where requests for comments are received, they must be passed on to the Head Teacher who will contact the CSEL immediately.

Staff must not publish any material which will bring the MAC/school into disrepute.

If employees wish to publish an article unconnected with the MAC/school, then the article should not link them to the MAC/school without express prior permission from the CSEL.

Appendix A: Low Levels Concern Policy

Section 1: Policy Statement

St Teresa of Calcutta MAC and XXXXXX School recognise its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

St Teresa of Calcutta MAC and XXXXXX School work to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

This Policy ensures the School's compliance with Part 4, para 424 of Keeping Children Safe in Education (2023) which states that:

Para 424: Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Section 2: Policy Scope

All employees employed at this school including:

- Teachers
- Support staff
- Supply teachers
- Volunteers
- Local Authority visiting staff
- Birmingham Catholic Diocese visiting staff
- Contractors
- St Teresa of Calcutta MAC Central Team
- Governors from the School's Local Governing Body
- Directors from St Teresa of Calcutta MAC Board
- Other adults in school visiting in a professional capacity, for example, visiting speakers from a charity.

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

Section 3: Policy Aims

- To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.
- To enable St Teresa of Calcutta MAC and XXXXXX School to identify concerning, problematic or inappropriate behaviour early.
- To minimise the risk of abuse occurring.
- To ensure that adults working in or on behalf of St Teresa of Calcutta MAC and XXXXXX School are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the School.
- To help create an environment where staff are comfortable to self-refer, where, for example, they have found 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 consider falls below the expected professional standards.

Section 4: Definition of Low Level Concerns

The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.

'Keeping Children Safe in Education' defines a low level concern as:

“any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the school or college 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”*

Section 5: Avoiding Low Level Concerning Behaviour

Behaviour defined as a ‘low level concern’ can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

St Teresa of Calcutta MAC and XXXXXX School ensure that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

- Staff Code of Conduct
- Safeguarding and Child Protection policies and regular training
- Teachers’ Standards (for teaching staff)

Section 6: Sharing Low Level Concerns

St Teresa of Calcutta MAC and XXXXXX School recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Having clear policies and procedures.
- Empowering staff to share any low-level concerns with the DSL/Headteacher/Chair of Governors/Local Authority Designated Officers
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school’s safeguarding system.

Section 7: Reporting a Low Level Concern

Low level concerns about a member of staff should be reported to the DSL and/or Headteacher as per the school’s Child Protection procedures. If the concern is about the Headteacher this should be reported to the Chair of Governors.

If the concern is about a member St Teresa of Calcutta MAC Central Team, the concern should be reported to the CEO.

If the concern is about the CEO, this should be reported to the MAC’s Chair of Directors.

Low level concerns about supply staff, contractors, local authority or other visitors visiting in a professional capacity, will also be reported to their employers or organisation they are representing.

Section 8: Responding to a Low Level Concern

The Headteacher (or the person responsible for dealing with the concern, as outlined in reporting a low level concern) will undertake an assessment to determine if the matter is a ‘low level concern’ or an ‘allegation’. The person responsible will ensure:

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the person responsible judge require guidance will be referred to the LADO for advice.
- Low level concerns that the person responsible judge should be dealt with internally will be dealt with via the School's usual child protection investigation process.

St Teresa of Calcutta MAC and XXXXXX School will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Section 9: Recording a Low Level Concern

All low level concerns should be formally recorded by a member of staff when they are made aware of them. (See Appendix 1). This record would then be passed to the Headteacher or:

- Chair of Governors, if the concern is about the Headteacher
- CSEL/CEO, if the concern is about a member St Teresa of Calcutta MAC Central Team.
- MAC's Chair of Directors, if the concern is about the CEO.

The record will include:

- Details of the concern.
- The context in which the concern arose.
- The outcome of the investigation and any action taken (Appendix 2), and
- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

Relevant records will be retained confidentially on the personnel file.

A separate summary overview record (Appendix 3) will be kept in a shared computer area in a Staff Conduct File. This is password protected. The file will contain all low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles

Section 10: Reviewing a Low Level Concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

St Teresa of Calcutta MAC and XXXXXX School will take advice, where appropriate, from their HR provider in respect of low level concerns.

St Teresa of Calcutta MAC and XXXXXX School will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns summary overview to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Low level concerns will not be included in a reference unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

Section 11: Related guidance

The policy links to the following guidance documents:

- Keeping Children Safe in Education (DfE)
- Code of Conduct
- Safeguarding Policy

St Teresa of Calcutta MAC and XXXXXX School

Low Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with St Teresa of Calcutta MAC and XXXXXX School staff 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

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible.

The record should be signed, timed, and dated and returned to the Headteacher * unless you wish to remain anonymous, which will be respected as far as reasonably possible.

*This record should be passed to the:

- Chair of Governors, if the concern is about the Headteacher
- CSEL/CEO, if the concern is about a member St Teresa of Calcutta MAC Central Team.
- MAC’s Chair of Directors, if the concern is about the CSEL/CEO.

Name of the adult you are concerned about:

Their role:

The context in which the concern arose:

Details of your concern:

Date and Time:

Your Name:

Signed:

Low Level Concern - Response

To be completed by the person responsible for dealing with the low-level concern. This would normally be the Headteacher.

Step 1: Decide upon a category

Category A	<ul style="list-style-type: none"> The person may have behaved in a way that has harmed a child, or may have harmed a child. The person has possibly committed a criminal offence. The person may have behaved in a way that indicates he or she would pose a risk of harm to children. The person may have behaved in a way that indicates they may not be suitable to work with children. <p>Action Required: Contact Birmingham's LADO without delay (0121 675 1669, Ladoteam@birminghamchildrenstrust.co.uk.)</p>
Category B	<p>After reviewing low-concern records, there is concerning, problematic or an inappropriate pattern of behaviour and this now meets the 'risk of harm' threshold for a referral.</p> <p>Action Required: Contact Birmingham's LADO (0121 675 1669, Ladoteam@birminghamchildrenstrust.co.uk.)</p>
Category C	<p>The person's behaviour/conduct is inconsistent with the staff code of conduct, including inappropriate conduct outside of school. It is possible that the behaviour has met 'risk of harm' threshold. The LADO has been contacted and advice sought. The LADO does not consider the behaviour meets the 'risk of harm' threshold for a referral and the behaviour should be dealt with as a low-level concern.</p> <p>Action Required: Deal with incident as a low-level concern.</p>
Category D	<p>The person's behaviour/conduct is inconsistent with the staff code of conduct, including inappropriate conduct outside of school. The behaviour does not meet the 'risk of harm' threshold, there is no history of problematic or an inappropriate pattern of behaviour and it is not necessary to contact the LADO.</p> <p>Action Required: Deal with incident as a low-level concern.</p>

Category: _____

If Category C or D, now proceed to Step 2. If Category A or Category B, this is an allegation and not a low-level concern. The Managing Allegations Against Staff Policy and procedures should now be followed.

Step 2: Record action taken to address the behaviour which was inconsistent with the staff code of conduct

Please consider:

- What action is required to ensure they understand your expectations of staff conduct.
- What action is required to minimise the risk of this behaviour reoccurring.

Now move to Step 3.

Step 3: The inappropriate behaviour was due to, or partly due to, wider cultural issues within the school.

Yes _____ No _____

If yes, please record changes within the School, or MAC.

Please consider:

- Changes to policies or processes.
- Changes to training.

Now move to Step 4

Step 4: Record this low-level concern onto your summary overview

To aid in the identification of trends and patterns, please record low level concerns onto summary overview. If you identify potential trends or patterns, please consider what action should be taken.

(If not Headteacher)

Your name:

Your role:

Signed:

Date:

Headteacher

Name:

Signed:

Date: