



STAFF CODE OF CONDUCT

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Introduction

The MILL Academy (the Trust) is a school trust currently comprising of: The Henry Box School, Queen Emma's Primary School and Finstock Church of England Primary School. The MILL Academy Trust is run by a Board of Trustees. The MILL Academy Trust endeavours to provide the best education possible for all of its pupils in an open and transparent environment.

All adults who work in schools must act professionally and create an environment that secures the safety and well-being of children and young people and the best outcomes for them. This relies on effective interactions and good relationships between adults and children. People who work with children and young people can be vulnerable and The MILL Academy Trust Code of Conduct provides advice and guidance to ensure that staff are aware of appropriate, professional behaviour. It also gives clear advice on what could be considered to be unwise behaviour or even misconduct. Our Code of Conduct aims to protect the safety and well-being of both children and all staff who work in the Trust

Purpose of Guidance

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. This guidance provides clear advice on appropriate and safe behaviours for all adults working with children in paid or unpaid capacities.

The guidance aims to:

- keep children safe by clarifying which behaviours constitute safe practice and which behaviours should be avoided;
- assist adults working with children to work safely and responsibly and to monitor their own standards and practice;
- set clear expectations of behaviour and practice relevant to the staff of The MILL Academy Trust;
- support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;
- minimize the risk of misplaced or malicious allegations made against adults who work with children and young people;
- reduce the incidence of positions of trust being abused or misused.

Guiding Principles

- Everyone who comes into contact with children and their families has a role to play in safeguarding children (DfE 'Keeping Children Safe in Education: Information for All Trust and College Staff, September 2025).
- The welfare of the child is paramount (Children Act 2004).
- It is the responsibility of all adults to safeguard and promote the welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with children and young people.
- Staff must be responsible for their own actions and behaviour and should not conduct themselves in a way which could lead others to question their motivation and intentions.
- The same professional standards should always be applied regardless of culture, disability, gender, language, racial origin, religious belief and/or sexual identity.
- Staff should work and be seen to work in an open and transparent way.

- Any incidents that causes concern must be recorded and records kept of decisions made in accordance with Trust policy.
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.
- All staff should know who the **Designated Safeguarding Leads (DSL)** are and they should be familiar with the Trust's Safeguarding policy and understand their role in safeguarding the well-being of children and young people.
- **The Nolan Principles - The Seven Principles of Public Life**
The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, **education**, social and care services. All public office-holders are both servants of the public and stewards of public resources. The principles also apply to all those in other sectors delivering public services.

The seven principles are:

1. Selflessness

Holders of public office should act solely in terms of the public interest.

2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty

Holders of public office should be truthful.

7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Duty of care

- When accepting a role that involves working with children all staff must accept the responsibilities and trust inherent in the role.
- All staff have a duty of care to children and must always act and be seen to act in their best interest.
- All staff whether paid or voluntary, have a duty to keep young people safe and protect them from physical and emotional harm. This is secured through the development of respectful, caring and professional relationships between staff and students and behaviour by staff that demonstrates integrity, maturity and good judgement.
- The Trust has a duty of care towards its employees and will provide a safe working environment and guidance about safe working practices in line with the Health and Safety at Work Act 1974. The act also requires employees to take care of themselves and anyone else who may be affected by their actions.
- There will be situations in which staff must make decisions or take actions where no guidance exists. Staff must always act to secure the best interests and welfare of children in their charge and will therefore be seen to be acting reasonably.

Power and Positions of Trust

- A relationship between a student and a member of staff is not a relationship of equals. Staff have a responsibility to ensure that they do not use their power to intimidate, threaten, coerce or undermine students. They should not use their status or standing to form an inappropriate relationship with students.
- Staff should avoid behaviour or situations that could be misinterpreted by others and report and record any incident that they are concerned could be misinterpreted.
- When a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with that child. Further guidance is found in the Sexual Offences Act 2003.

Confidentiality

- All staff have daily responsibilities that mean they will have access to confidential; information about children. Our system of confidentiality works on a 'need to know' basis and confidential information must not be discussed casually with colleagues. In some circumstances however, information may need to be anonymous. Information must never be used to intimidate, embarrass or humiliate students. Always be cautious about passing information about children to other people. Always follow GDPR and ensure you are up to date with this.
- There are circumstances in which staff **MUST** share information about a child with an appropriate person – for example when abuse or neglect is suspected, **this must be reported to a Designated Safeguarding Lead (DSL)**. If in any doubt always consult a member of the Trust or School Leadership Team. Any legal or press enquiries must always be passed to a member of the Trust Leadership Team. All staff must make sure that students understand that information that they disclose to you about any matter cannot be kept confidential and that **you cannot offer them a special confidential relationship**. If you do so you are putting yourself at risk in terms of how this could be interpreted by others.

- The Data Protection Act of 1998 governs the storing and processing of information about students and if clarification is required, consult **the DSL**.

Propriety and Behaviour

- All adults working with children and young people have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.
- There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in their workplace or indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.
- Conduct outside of work: unlike some other forms of employment, working at The MILL Academy Trust means that an employee's conduct outside of work could have an impact on their role. The MILL Academy Trust staff must not engage in conduct outside work which could seriously damage the reputation and standing of the Trust or the employee's own reputation or the reputation of other members of the Trust's community. Employees should be aware that any conduct that we become aware of that could impact on their role within the Trust or affect the Trust's reputation will be addressed under our disciplinary procedure. This includes use of social media even where comments are not publicly available. We therefore expect employees to make us aware immediately of any such situations that have happened outside of The MILL Academy Trust.
- Employees may take up additional employment, paid or unpaid, providing it will not create a conflict of interest, cause the Trust reputational harm or adversely affect an employee's ability to carry out their duties and responsibilities for the Trust effectively and efficiently e.g. significant increase in workload.

Private tutoring of children that attend Trust Schools is not permitted as this is in direct conflict with The Nolan Principles (see pages1-2).

- Paid or unpaid employment includes, but is not limited to:
 - taking up employment with any employer on any type of contractual arrangement;
 - running your own business;
 - private tutoring;
 - holding directorships or trusteeships;
 - participating or having any other interest in organisations that may be a competitor or supplier to the Trust.
- Prior permission must be sought from the School's Headteacher before taking up any additional employment.
- Carrying out public duties (e.g. jury service) does not count as additional employment.

- Employees must not use any Trust property or facilities to support additional employment and any customer must be informed that the private nature of the work is not connected with the Trust and School.
- Adults in contact with children and young people should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.
- The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by an employer as to whether there may be a potential risk to children and young people in the workplace.
- Employees must not market their private business using school/Trust data.
- Employees must not exploit their school/Trust contacts with staff/parents/families/students/carers to market or sell services/products from their own personal business enterprises for personal financial gain.

Personal Conduct, Dress and Appearance

- Staff should think carefully about revealing details of their personal lives to students, for example, the context in which it is happening, and should not discuss their personal lives within the hearing of students.
- Staff should not make, or encourage others to make, unprofessional, personal comments which scapegoat, demean or humiliate or might be interpreted as such. This includes staff to staff communications.
- No child or young person should be in or invited into the home of a member of staff unless the reason for this has been firmly established and agreed with parents/carers and the Headteacher. Staff should be vigilant in maintaining privacy and mindful of the need to avoid placing themselves in vulnerable situations.
- Dress is a matter of personal choice; however, staff should ensure that their dress and appearance is appropriate to their professional role, which may be different from that adopted in their personal life. Staff should be dressed safely and appropriately so that appearance promotes a positive and professional image, and does not render them vulnerable or open to criticism. Dress should not be offensive, revealing, sexually provocative, cause embarrassment or give rise to misunderstanding.

Dress Code

Purpose

Appearance

Religious and cultural dress

Implementing and review

Purpose

We encourage everyone to maintain an appropriate standard of dress and personal appearance at work and to conduct themselves in a professional manner.

The purpose of our dress code is to establish basic guidelines on appropriate clothing and appearance at our workplace, so that we:

- promote a positive image and staff look professional;
- respect religious, racial and gender-specific clothing requirements and those of staff with disabilities where possible;
- take account of health and safety requirements; and
- help staff decide what clothing it is appropriate to wear to work.

Different departments may have specific requirements that result in particular clothing demands, for example, because their work raises health and safety risks. It is important that all staff dress in a manner appropriate to their working environment and the type of work they do.

We expect staff to take a common-sense approach to the dress code. Any enquiries regarding the operation of our dress code (including whether an article of clothing is suitable to wear to work) should be made to their line manager or the HR Officer.

Appearance

- While working for us you represent us with students, parents and the public. Your appearance contributes to our reputation and the development of the Trust. It is important that you appear clean and smart at all times when at work.
- All members of staff are supplied with an identity badge that must be worn and visible at all times when you are at work.
- With the exception of PE teachers, staff should not wear casual or gym wear to work. This includes track suits, sweat-shirts, casual or sports t-shirts or shorts, combat trousers, jogging bottoms, denim, or leggings.
- Clothing should not be dirty, frayed or torn. Tops should not carry wording or pictures that might be offensive or cause damage to our reputation. It is inappropriate to wear clothing such as cut-off shorts, crop tops, see through material or clothes that expose areas of the body normally covered at work.
- Footwear must be safe and clean and take account of health and safety considerations. Trainers, and flip-flops are not acceptable.
- Where we provide safety clothing and equipment, including protective footwear, it should be worn or used as appropriate and directed.
- Staff should not wear excessive or unconventional clothing or jewellery that could present a health and safety risk.
- Hair should be neat tidy and well groomed. Hair styles and colours which are considered extreme may be deemed as unacceptable.
- We recommend that tattoos where appropriate should remain covered at all times if they compromise a professional appearance.
- A professional appearance must be maintained at all times i.e. shirt, trousers, skirt, suits and dresses.

Religious and cultural dress

- Staff may wear religious and cultural dress (including clerical collars, head scarves, skullcaps and turbans) unless it breaches this policy or compromises the health and safety of the wearer, their colleagues or any other person.
- Where necessary the HR Officer can disseminate appropriate information explaining cultural dress and customs.
- Priority is at all times given to health and safety requirements. Where necessary, advice will be taken from our Health and Safety Officer.

Implementing and review

- Line Managers are responsible for ensuring that staff observe the standards set by this dress code.
- Failure to comply with the dress code may result in action under our Disciplinary Procedure.
- In serious cases, where an employee's appearance is, in the Headteacher's view, unacceptable the employee may be required to return home to change. In these circumstances the employee will not be paid for the duration of his/her absence from work.
- On professional development days and holiday periods staff should wear smart casual dress. This excludes outward facing staff who continue to have direct contact with members of the public i.e. main office staff, who should continue to wear smart dress as above.
- We will review the dress code periodically to ensure that it meets our demands, in particular with regard to health and safety of our staff and all those they deal with.

Gifts, rewards, favouritism, infatuation

- It is acceptable to receive small tokens of appreciation from children or parents at Christmas or as a thank-you but staff should be careful not to accept any gift that could be considered a bribe to lead the giver to expect preferential treatment. Gifts of a significant value should not be accepted neither should gifts on a regular basis.
- It is not acceptable to give gifts to students. Any recognition given to students should be part of the Trust's rewards system and available to all students to avoid charges of favouritism.
- It is not uncommon for students to become attracted to members of staff and all staff should be aware that such situations carry a high risk of words or actions being misinterpreted. If a member of staff finds themselves or a colleague in this situation they should talk to a member of the Trust/School Leadership Team as soon as possible to allow steps to be taken to avoid hurt and distress to both parties.

Social Contact, Physical Contact

- Staff must not establish social contact with students outside of Trust to establish a friendship or to strengthen a relationship. Social contact can be misconstrued. Staff should report any situation that they feel could compromise themselves or the Trust to a School Leader.
- Staff should not give out personal details such as their home phone number, address or e-mail address to students unless the need to do so is communicated to senior staff.

- A no touch approach is not always appropriate or practical in some circumstances i.e. a young child has injured themselves or you need to break up a fight, but generally please operate a 'no touch' approach at all times. It is important to understand that well intentioned physical contact can be misinterpreted by the student or an observer. Staff must use their professional judgement at all times. Physical contact must never be secretive or represent an abuse of authority, never indulge in 'horseplay'.
- Extra caution is required when it is known that a child has suffered from previous abuse or neglect. The child might associate physical contact with these circumstances and this makes staff vulnerable to allegations of abuse.
- **Physical education and other activities requiring physical contact** – staff who teach PE or who offer music tuition will on occasions need to initiate physical contact with students in order to support the students to perform a task safely/appropriately. This must be done with the student's agreement and should be for the minimum time necessary.
- **Showers and changing** – students need privacy and respect when changing clothes or taking a shower but there needs to be an appropriate level of supervision to safeguard young people, to ensure health and safety and to make sure that bullying or teasing doesn't occur. Staff should avoid physical contact when students are changing, avoid intrusive behaviour in changing rooms, announce their intention of entering, and avoid staying in the room unless student needs dictate. Staff must not change in the same room as students or take showers with students.
- Distressed students may need comfort and reassurance and this may involve age appropriate physical contact. Staff should remain self-aware at all times and ensure that contact is not threatening, intrusive or open to misinterpretation. Always ask a member of the senior team if you are not sure what is appropriate.

Care, control and physical intervention

The circumstances in which staff can intervene with a student are covered in the 1996 Education Act. Staff may intervene to prevent a student from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff must have regard to the health and safety of themselves and others. In all situations where physical intervention is used, the incident and actions must be recorded.

Under no circumstances can physical force be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

For a detailed guide on intervention consult the ***School procedure on 'Physical Intervention' and all staff should adhere to this policy.***

Behaviour Management

Students must be treated with respect and dignity and we must expect students to treat staff in the same way. Procedures for dealing with breaches of the Trust's behaviour code are covered in the 'Behaviour Blueprints' for each school and the School's 'Attendance, Behaviour and Exclusions' policy

and these must be followed. Always try to defuse a situation before it escalates and the use of humour is often helpful. Corporal punishment is unlawful; staff should not use degrading treatment for punishment. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable. It is important to inform parents of sanctions and work with them to secure the changes in behaviour required.

Sexual Contact

Any sexual contact by a member of staff towards a child or young person is illegal and this is not dependent on whether the young person consents or not. Sexual activity also includes the watching or production of pornographic material. Staff should ensure that their relationships with children and young people take place within the boundaries of a respectful, professional relationship and take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with adolescent boys and girls.

One to One situations

Staff should avoid meeting students in remote, secluded areas of the school and should ensure that they can be seen when they are seeing a child on their own, for example for extra help after school or in the lunch hour. Keep the door open or sit where you can both be seen through the door pane. Staff are particularly vulnerable in areas such as counselling rooms.

Home Visits

Under no circumstances should an adult visit a child in their home outside agreed work arrangements or invite a child to their own home or that of a family member, colleague or friend. If in an emergency, such a one-off arrangement is required, the adult must have a prior discussion with a member of the School Leadership Team. In general staff other than the Inclusion Team and the Family Support Team would have no reason to visit the home.

Home visits should follow the School's lone worker guidelines. The following procedures should always be adhered to:

- agree the purpose for any home visit with senior management, unless this is an acknowledged and integral part of their role e.g. social workers
- adhere to agreed risk management strategies
- always make detailed records including times of arrival and departure and work undertaken
- ensure any behaviour or situation which gives rise to concern is discussed with their manager and, where appropriate action is taken

Educational visits and after school clubs

Staff need to take particular care when supervising students in less formal situations such as after school activities, visits and residential. It is important to make sure that the less formal situation doesn't lead to situations where behaviour is misinterpreted and an inappropriate relationship established. Where overnight stays are involved and boys and girls are going, it is important that staffing reflects the gender balance of the students. All trips should be organised in line with school policy outlined in '**Educational Visits Guidance**'. **Lists of students and their whereabouts should be left with the Educational Visits Co-ordinator and with the School Office** so that they can be consulted by staff at school and the list

should include an estimated time of arrival back at Trust. **This includes arrangements for sports teams.** A contact mobile number for the supervising member of staff must be left with the names list.

Transporting Children

There may be situations in which staff agree to transport children in their own vehicle. It is not advisable to transport a single child in a car unless there is no alternative. If a member of staff transports children in his or her car it must be with the agreement of the parents (unless there is an emergency situation and they cannot be contacted). The car must be roadworthy and appropriately insured to include the transport of children as part of your daily job. Staff must check the detail of their individual insurance policy. No member of staff will be expected to use their own vehicle to transport children as part of Trust activities. The use of volunteer parents, in exceptional circumstances, should be discussed with the Headteacher in advance and the same safeguarding applied.

First Aid, Administration of Medication and Intimate Care

- All PE staff are first aid trained. The school provides staff training through the professional development programme. Staff should be cautious about administering first aid and in general should send for trained staff who have undergone more extensive training than the standard staff training. Wherever possible first aid should be administered with another adult present. Suitable records must be kept including accident forms, if appropriate, and parents informed as soon as possible. Always try to reassure students and explain what is happening to them.
- No medication can be kept or administered by staff. All medication must be sent to the Nurse, if applicable, or the Trust Office and administered from there by the child themselves. Permission forms have to be received from the parents/carers of any child taking medicine in school.
- Staff organising trips should make sure that a first aid trained staff member accompanies the trip and should check with the school to ensure that the member of staff has the required level of first aid training.
- Children who receive intimate care have a right to safety, privacy and dignity. A care plan must be drawn up and agreed with parents for students who require regular intimate care. Students must always be encouraged to be as independent as possible. We must always be mindful of the additional vulnerability of students with disabilities and learning needs. All guidelines and policies relating to intimate care are kept with the School Office.

The Curriculum and Sensitive Issues

- Many areas of the curriculum can include subject matter which is sexually explicit or of a sensitive nature. It is very important that this work should clearly relate to learning outcomes that can be identified in lesson plans and schemes of work to ensure that they are not misinterpreted. Curriculum leaders should provide guidance to colleagues regarding such issues. Unplanned discussion about sexual and sensitive matters can also take place and response needs careful, sensitive and professional judgement. Always talk to a School Leader staff if guidance is needed or staff are concerned by matters that have been raised in lessons. Be particularly alert to any conversations or knowledge shown that could indicate

child protection concerns or are offensive to the member of staff. Always seek the support and guidance of line managers or senior colleagues. Staff must be careful to avoid a situation in which they are drawn into offensive or inappropriate discussions or could be accused of encouraging such discussion.

- All staff must abide by the school Personal Development Policy. Parents have the right to withdraw their child from all or part of sex education but not from the aspects of the science curriculum relating to the biological aspects of human growth and development.

Photography, Videos and other Creative Arts

- Staff should not take, display or distribute images of children unless they have **consent from parents or carers and the child to do so**. The Trust does not wish to reduce the use of photographs or films of Trust events in display, publicity materials or items such in the School Newsletter, but the guidance included in this document should be adhered to.
- There is the potential for any images of children and young people to be used inappropriately. We must take every precaution to ensure that this doesn't happen whilst still making sure that we use photographic and video records as a way of celebrating success and achievement.
- Staff should be aware that past experiences could make some children feel uncomfortable about being photographed or filmed, and should be sensitive to signs of discomfort and anxiety.
- Images used for publicity purposes require the consent of the individual and parent or legal carer if under 18. This is also required for images on websites and images displayed in public places where visitors have access such as a reception area. All parents are consulted so that they can indicate if their child's photograph cannot be used in displays and publicity materials. This information is held in SIMs and staff requiring permission for use of images should check with **the Data Team** to ensure that parents have not refused consent. Such procedures are not meant to deter staff from using images but are intended to protect both children and staff.

The following guidelines **must be adhered to at The MILL Academy Trust**:

- If photographs are used the student should not be named on websites or in places with regular public access such as a reception area.
- If students are named, for example on displays of work, avoid use of photographs.
- All staff must be particularly careful with material stored on school laptops. Staff should download all photographs taken on school trips and at events that include children to the network.

Safe use of the Internet and mobile phones

- Mobile phones and the use of the internet by students should be in accordance with the school's guidance on the safe use of ICT in student planners and revisited in ICT lessons. All staff should be familiar with this document and ensure that students using ICT in lessons, accessing websites and using e-mails are closely monitored.

- Under no circumstances should staff access inappropriate images in school and should be aware that if an illegal act is committed through downloading, storing or disseminating inappropriate materials involving children they are likely to be barred from working with children and young people. Accessing inappropriate materials including adults', would also be considered a very serious matter and a breach of professional standards.

Staff must not to share personal e-mail address or mobile phone numbers with students. School e-mail addresses should be used by staff at their discretion to communicate with students and/or their parents and carers. Staff should also exert extreme caution in the use of **social networking sites**, such as Facebook, which can easily be accessed by students and enable access to personal information that could be used inappropriately. Staff are strongly advised not to make comments on students' personal networking sites. Staff should always ensure that their communication with students remains at a professional and transparent level so that their intentions cannot be misinterpreted. Further guidance is available in OCC's **Simple Guidance for Staff in Education Settings on the Use of Social Network Sites** (attached).

Whistleblowing

Whistleblowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies. This is particularly important where the welfare of children may be at risk. Staff should follow guidance in the Trust's **Whistleblowing** policy.

Sharing Concerns and Recording Incidents

- All staff must be aware of the Trust's child protection procedures. This includes procedures for dealing with allegations against staff. If a member of staff is the subject of an allegation s/he is advised to contact his/her Union immediately.
- In the event of an incident occurring and an allegation being made against a member of staff, the information must be clearly and promptly recorded and reported to a member of the senior team. Early contact with parents/carers could avoid misunderstandings.
- Staff should feel confident, to discuss with either the headteacher, a member of the School Leadership Team, or their line manager, any difficulties that may affect their relationships with students or their ability to undertake their roles as effectively as is the norm so that support can be offered or action taken.
- It is essential that accurate and comprehensive records are maintained wherever concerns are raised about the conduct or actions of adults working with or on behalf of children and young people.

In broad terms, the Trust would expect staff to report the following:

- criminal offences
- any reasonable suspicions or evidence of physical, emotional or sexual abuse of children

- failure to comply with financial and legal obligations
- actions which endanger the health or safety of staff and students or the public
- actions which are intended to conceal any of the above

It will not always be clear that a particular action falls within one of these categories and members of staff will need to use their own judgement. However, the Trust prefers that any suspicions are reported rather than ignored. If members of staff make a report in good faith, and even if it is not confirmed by investigation, they will not be liable to any disciplinary action or be otherwise disadvantaged in their employment. However, it should be noted that if they make a report maliciously, mischievously or for personal gain they may be liable to disciplinary action.

Procedure for Recording Low-Level Concerns About a Member of Staff (NSPCC May 2025)

1. Purpose

This procedure ensures that all low-level concerns about the conduct of staff or volunteers are recorded, reviewed, and responded to appropriately, in line with our safeguarding culture and duty to protect children. It aims to promote transparency, uphold professional standards, and prevent potential harm.

2. Definition of a Low-Level Concern

A **low-level concern** is any concern, no matter how small, that an adult working in the organisation may have acted in a way that:

- is inconsistent with the staff code of conduct or organisational values,
- is inappropriate or causes unease, even if not serious enough to meet the threshold for referral to external agencies,
- may suggest a pattern of behaviour that could lead to abuse.

This includes behaviour that:

- is thoughtless or inadvertent,
- may be inappropriate in context,
- may be intended to enable abuse.

Examples include (but are not limited to):

- Being over-friendly or having favourites,
- Taking photos of children on personal devices,
- Isolating children in unsupervised or secluded spaces,
- Humiliating or belittling behaviour,
- Contact with children outside normal working hours or channels.

3. Who Should Report a Low-Level Concern?

- Any member of staff, volunteer, or visitor who has a concern about an adult's behaviour.
- Staff should also feel empowered to self-report if they believe their own actions may have been misinterpreted.

4. How to Report a Low-Level Concern

- Report concerns **as soon as possible** and on the same day where possible.

Complete a **Low-Level Concern Record Form** here:

**The MILL Academy and
The Henry Box School**



**Finstock Church of England Primary
and Queen Emma's Primary**



<https://forms.office.com/e/tWMmnLj9vc>
<https://forms.office.com/e/cjg5swdncW>

Submit the completed form to the Headteacher via this form.

5. How the Concern Will Be Managed

The Headteacher will:

- Review the concern and assess whether it meets the threshold for further action.
- Log it securely in the **Low-Level Concerns Register**.
- Consider patterns, previous concerns, or escalation.
- Speak with the individual involved, if appropriate, to clarify context and intent.
- Seek further information or advice from the Local Authority Designated Officer (LADO) if unsure.

The concern may lead to:

- Informal support, guidance or reflective discussion,
- A recommendation for training or further induction,
- Adjustments to practice or supervision,
- Escalation if new information comes to light.

6. Record-Keeping

All low-level concerns must be recorded and stored securely and confidentially.

Records should be:

- Factual, proportionate, and non-judgmental,
- Retained in accordance with the school's safeguarding and data protection policies.

They are **not** kept on an employee's main personnel file unless part of a formal disciplinary process.

7. Safeguarding Culture and Staff Training

This procedure is part of a broader commitment to a **culture of vigilance, transparency, and accountability**.

Staff will receive training on:

- Recognising and reporting low-level concerns,
- Professional boundaries and the staff code of conduct,
- The importance of early intervention and recording.

8. Review

This procedure will be reviewed annually or following any significant safeguarding incident or change in statutory guidance.

Social Media and Online Conduct Guidance

Purpose

This guidance provides clear advice for school staff and volunteers on the safe and professional use of social networking and communication technologies.

Key Principles

1. Protect Your Professional Reputation

- Avoid posting anything that could bring your school, colleagues, pupils or parents into disrepute.
- Think before you post – even private comments can be shared or misinterpreted.
- Avoid joining or engaging with groups or pages that may undermine your professional image.
- Assume everything you post could become public.

2. Privacy & Security

- Set social media accounts to the **highest privacy settings** (e.g. 'friends only').
- Use **strong, unique passwords** and enable two-factor authentication.
- Never share login details or leave accounts logged in on shared devices.
- Review your online presence regularly (e.g. Google your name).

3. Communication with Pupils & Parents

- **Do not 'friend', follow, or message pupils** (current or former under 18s) on personal accounts.
- Do not engage in online communication with parents unless agreed by school leadership.
- Only use **school-approved** platforms for educational communication (e.g. school email or learning platforms).
- Keep communication professional, transparent, and open to scrutiny.

4. Safe Use of School Equipment & Data

- Use only school devices and accounts for storing or sharing pupil data or photographs.
- Do not store school data on personal devices unless encrypted and permitted by policy.
- Ensure personal use of school laptops does not violate your ICT or safeguarding policies.
- **Never access or store inappropriate or illegal content** on any school device.

5. Social Media & Safeguarding

- Online contact with pupils can be misinterpreted or abused—**avoid it entirely**.
- Do not give personal contact details to pupils.
- Be cautious with language and tone online—avoid humour or comments that could be misunderstood.
- Report any online safeguarding concerns immediately to the DSL.

Best Practice

✓ Do	✗ Don't
Use professional school accounts for work communication	Use personal social media to contact pupils or parents
Regularly check and update your privacy settings	Post anything that could damage the school's reputation
Store school data securely on school systems	Save or copy school data to personal devices or cloud storage
Refer to your school's Acceptable Use Policy (AUP)	Assume your social media is truly private
Report online concerns to the DSL or senior leader	Respond to inappropriate online messages from pupils

Photographs & Video

- Use **school equipment** only to take pictures of pupils.
- Store images securely on school systems—not personal devices or cloud services.
- Follow the school's consent procedures for sharing images.

Staff Responsibilities

- Follow the Trust's **AUP and safeguarding policies** at all times.
- Be aware that failure to comply may result in disciplinary action.
- Understand that your online behaviour, even outside work, must align with your professional responsibilities.

Need Support?

- Refer to HR, DSL, Headteacher or Union for further advice.

Remember:

"Don't post anything you wouldn't want your headteacher, a parent, or your pupils to see."

Using email

All emails sent from a school or college account should be regarded as public, especially as a 'data subject access' request could be made under the Data Protection Act. Emails should always be in professional language and appropriate to being an employee. It should also be noted that where a private email account is used for issues associated with work, it has in some cases been deemed as a work account and therefore also subject to the rules of professional language and conduct.

In short, do not send an email that you would not be happy for your employer or a colleague to read. Please see the Trust's Email Protocol below:

Trust Email Good Practice Protocol

Subject: Trust Email Good Practice Protocol

Please be reminded that all emails sent from a school or college account should be regarded as **public**. Under the Data Protection Act, emails may be disclosed following a subject access request. Therefore, all communication should be professional in tone and content.

Professionalism and Email Accounts

Only use your **school email account** for work-related communication. Using a personal account for work matters may still be considered subject to professional expectations and public access.

In short: **If you wouldn't want a colleague or your employer to read it, don't send it.**

Email Best Practice

General Guidelines

- Always include a **clear subject line** (include student name/form when relevant).
- Keep emails **clear, factual, and professionally worded**, with correct spelling and punctuation.
- Seek guidance from your line manager if unsure about email content.
- Never forward or send inappropriate, offensive, or discriminatory content.
- Do not unlawfully forward confidential or copyrighted information.

School Email Use

- **Do not use personal accounts** to contact students or parents.
- Be mindful of your screen (e.g. when your whiteboard is on).
- The Trust reserves the right to monitor internal emails. There is no reasonable expectation of privacy.

Targeting Emails

- Only copy in those who **need** the information.
- Avoid copying in line managers unnecessarily.
- Use **'All Staff'** emails only if you are the Headteacher, HR, or SLT.
- Do not send general notices via 'All Staff' – use school briefings instead.

Replying and Forwarding

- Always **reply to the correct sender** and check recipients before responding.
- Do not forward emails without the sender's permission (except where necessary).
- Do **not BCC** recipients – use CC transparently.
- Emails to the School Office may be shared internally as needed.

Timing and Email Curfew

To support staff wellbeing:

- **No emails or Teams messages** should be sent between **7:00pm – 7:00am**, or during weekends (**7:00pm Friday – 7:00am Monday**).

- You may draft messages during these hours, but schedule them to send after 7:00am.
- Expect responses **within 48 hours**; avoid chasing before then.
- For urgent matters, use a different form of communication.
- Staff may not monitor emails during holidays.
- Avoid using personal devices to access work emails where possible.

Professional Tone

- Emails represent you and the school – always use **professional, clear, and neutral language**.
- Avoid emotional or ambiguous wording.
- Use tools like **Grammarly** to help with spelling and grammar: [Grammarly Website](#)

Legal Consideration

Emails have the same legal status as signed documents and may be used as evidence. Keep this in mind when writing or responding.

Home School Communications Protocols are available on our school websites.

Source Documents

- Keeping Children Safe in Education, DfE, September 2025
- Guidance for Safe Working Practices for the Protection of Children and Staff in Educational Settings. February 2005. Produced by The National Network of Investigation and Referral Support Co-ordinators (IRSC) established by the DfES.
- Guidance for Safer Working Practice for Adults who Work with Children and Young People. Updated from the above
- Gov.Uk The 7 Principles of Public Life
- NSPCC May 2025