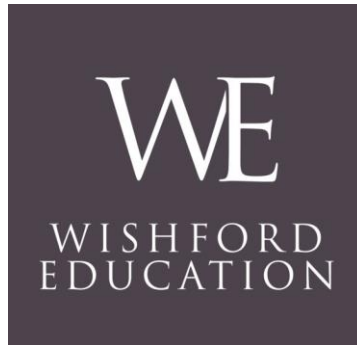




WISHFORD EDUCATION

STAFF BEHAVIOUR POLICY

Including Code of Conduct, Low-Level Concerns & Whistleblowing

This policy applies to all Wishford schools including all school based EYFS settings.

Last Review	Significant changes
September 26	New central policy to align with new Safeguarding policy template

1. Policy Statement

- This policy should be read alongside the school's Safeguarding policy and is aligned with the legislation and statutory guidance listed in section 3 of that policy.
- In addition, this policy considers other relevant legislation including the Sexual Offences Act 2003 (section 16) which provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 (where that person is in a position of trust in respect of that child), even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if they do not teach the child.

This policy should be read alongside the following group and school policies and documents:

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|---|--|
| <ul style="list-style-type: none">• Access to school accommodation• Anti-bullying• Behaviour (pupils)• Complaints• Data Protection• First Aid• Health & Safety• Mobile phone & Acceptable use (policy & risk assessment) | <ul style="list-style-type: none">• Restrictive Interventions• Risk Assessment• RSE & PSHE• Safeguarding• Safer Recruitment• SEND• SENDA |
|---|--|
-
- Staff¹ have an influential position in any school and must act as role models for pupils by consistently demonstrating high standards of behaviour and continuously promoting the school's aims and ethos, as well as a culture of equality, respect and inclusion.
 - Staff must remain aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the pupil due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten pupils.
 - The following code of conduct is not exhaustive. It is a summary of key aspects of staff conduct which can be found across the catalog of group and school policies and procedures, Staff are expected to always adhere to our policies and procedures in full.
 - If situations arise that are not covered by either the code of conduct or a written document/policy, we always expect our staff to use their professional judgement and act in the best interests of the group, the school and its pupils.
 - Whenever a potential breach of the code of conduct has/might occur, staff should consult (self-report) with their headteacher as soon as is practically possible.
 - Each school/Headteacher may issue additional/contextual guidance on staff conduct (e.g. within a staff handbook), which must also be followed (as long as it does not contravene this policy or any other legal/statutory duties). Staff should contact the governance team (governance@wishford.co.uk) or use the whistleblowing form (see section 5) if they have concerns about local expectations/rules relating to staff conduct.
 - Failure to follow the following code of conduct or other aspects of this policy may result in disciplinary action being taken, as set out in our staff disciplinary procedures.

¹ For the purposes of this code of conduct, the term 'staff' refers to any adult working for or on behalf of the school in any capacity caring for/educating children (whether paid or voluntary).

2. The Code of Conduct

We expect that all teachers will act in accordance with the personal and professional behaviours set out in the [Teachers' Standards](#). In addition, we expect all staff to adhere to the following minimum standards. Staff must:

- Always prioritise children's safety and wellbeing.
- Never engage in any illegal activity.
- Immediately disclose any incident/information which might impact their suitability to work with children.
- Have proper and professional regard for the ethos, policies and practices of their school.
- Complete any allocated induction/training and take responsibility for identifying and filling the gaps in their own knowledge and training.
- Understand and fulfil their responsibilities in relation to Keeping Children Safe in Education (KCSIE) and the school's Safeguarding policy (including escalating concerns whenever necessary and reporting low-level concerns/allegations relating to other staff - see below).
- Know and follow the school's rules/risk assessment relating to the acceptable use of technology and never knowingly undermine or circumvent the school's monitoring and filtering systems.
- Behave in an honest, respectful, professional, and appropriate manner at all times; on/off site, on/offline and during/outside of normal operating hours. *Staff must use their professional judgment to decide the threshold for unacceptable behaviour in any given context. Behaviour which might cause offense, raise complaints or bring the school/group into disrepute should always be avoided.*
- Avoid expressing partisan views/beliefs which might undermine the Fundamental British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- Never discriminate/show bias against any of the Protected Characteristics outlined in the Equality Act 2010 (Age, Disability, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity, Race, Religion or Belief, Sex and Sexual Orientation).
- Avoid any unnecessary physical contact (with adults and children), follow the Restrictive Interventions policy and NEVER use corporal punishment on a child.

- Avoid any form of sexual harassment and report any concerns/incidents to your school's headteacher or allocated point of contact.
- Avoid any accusation of favoritism, bias or 'conflict of interest' when making professional decisions or accepting/giving gifts.
- Avoid all personal relationships with current and past pupils under the age of 18²³
- Be discerning when engaging in any personal relationship with parent(s) or ex-pupils who are over the age of 18 (on/offline).
- Protect online profiles so they are not easily accessible to current/past pupils and parents.
- Be mindful of data protection and potential subject access requests when communicating online. Never post any pupil/parent data/images online without the explicit consent of the Headteacher (i.e. where it is relevant to your role).
- Mitigate risks whenever possible to protect others and themselves, e.g. by following intimate care procedures or avoiding any 1-to-1 activity with a child unless it is both necessary and observable (never take a child out of sight/earshot for a conversation).
- Never act in a way which risks the health and safety of others and always act upon health and safety concerns.
- Not use School property/brand for any unauthorised use or for private gain.
- Never consume any substances/intoxicants before or during the care of children and follow strict procedures in relation to medication.
- Inform school leadership if any medical needs or disabilities might impact your ability to perform your duties safely.
- Maintain high standards of attendance, punctuality, and appearance.

³ It is recognised that relatives (or children of friends) of staff often attend our settings and so personal relationships outside of school are unavoidable in these circumstances. Headteachers should always be made aware of these circumstances and consideration given for any potential bias or conflict of interest.

3. Managing allegations that may meet the harm threshold

- This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education (KCSIE) 2026. It should be read alongside the group's Disciplinary and Conduct policy. Contact details for local safeguarding partners and other advisory agencies and reporting procedures for allegations against staff can be found in the school's safeguarding policy.
- This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, trainee teacher, volunteer or contractor, has:
 - Behaved in a way that has harmed a child, or may have harmed a child, and/or
 - Possibly committed a criminal offence against or related to a child, and/or
 - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children - this includes behaviour taking place both inside and outside of school
- If there is any doubt as to whether a concern meets the harm threshold, the local authority designated officer (LADO) should be contacted for advice.
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- A 'case manager' will oversee any investigation. This will be the headteacher, or the CEO/Proprietor where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
- Our procedures for dealing with allegations will be applied with common sense and judgement.
- If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

- Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available, and there is no reasonable alternative and/or we deem suspension to be in the best interests of the school and member of staff.
- Based on an assessment of risk, we will consider alternatives such as:
 - Redeployment within the school so that the individual does not have direct contact with the child or children concerned
 - Providing an assistant to be present when the individual has contact with children
 - Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
 - Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
 - Temporarily redeploying the individual to another role in a different location, for example, to an alternative school within the group.
- If in doubt, the case manager will seek views from the group's HR adviser and the LADO, as well as the police and local authority's children's social care, where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation

- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

1. Conduct basic enquiries in line with local procedures to establish the facts, to help determine whether there is any foundation to the allegation before carrying on with the steps below.
2. Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services (the case manager may, on occasion, consider it necessary to involve the police before consulting the LADO - for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as possible after contacting the police).
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or local authority children's social care services, as appropriate.
5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care.
6. **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
7. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
8. **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate.
9. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate, including the group's counselling service.

10. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
11. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child - no information will be shared regarding the staff member).
12. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
13. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
14. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.
15. Settings with regulated nursery provision (under 2-year-olds), will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

Additional considerations for supply teachers, trainee teachers, and all contracted staff

- If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teacher, or contracted staff member provided by an agency, the school shares safeguarding responsibilities with the employment agency or business. We will take the actions below in addition to our standard procedures.
 - We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
 - The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
 - We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
 - We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

Specific actions

- **Action following a criminal investigation or prosecution:** The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering any information provided by the police and/or local authority children's social care services.

- **Conclusion of a case where the allegation is substantiated:** If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.
- **Individuals returning to work after suspension:** If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.
- **Unsubstantiated, unfounded, false or malicious reports** - If a report/allegation is:
 - Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the report/allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate.
 - Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made the report/allegation.

Confidentiality and information sharing

- The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- The case manager will take advice from the governance team, LADO, police and local authority children's social care services, as appropriate, to agree:
 - Who needs to know about the allegation and what information can be shared
 - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
 - What, if any, information can be reasonably given to the wider community to reduce speculation
 - How to manage press interest if, and when, it arises

Record-keeping

- The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
- The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
 - A clear and comprehensive summary of the allegation
 - Details of how the allegation was followed up and resolved
 - Notes of any action taken, decisions reached and the outcome
 - A declaration on whether the information will be referred to in any future reference
- In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.
- We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

- When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

- After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.
- This will include consideration of (as applicable):
 - Issues arising from the decision to suspend the member of staff
 - The duration of the suspension
 - Whether or not the suspension was justified
 - The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.
- For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

- Abuse can be reported, no matter how long ago it happened.
- We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
- Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

4. Low-Level Concerns: Reporting & Managing concerns that do not meet the harm threshold

Overview

- This section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. It should be read alongside the group's Disciplinary and Conduct policy. Contact details for local safeguarding partners and other advisory agencies can be found in the school's safeguarding policy.
- This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 3 above.
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.
- All staff should share any low-level concerns they have using the reporting procedures set out in their school's safeguarding policy. We also encourage staff to self-refer if they find themselves in a situation that could be misinterpreted. If staff are not sure whether behaviour would be deemed a low-level concern, we encourage staff to report it and allow school leaders to consider whether the matter reaches the low-level concern threshold.
- All reports will be handled in a responsive, sensitive and proportionate way. Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage. This creates and embeds a culture of openness, trust and transparency in which our values and expected behaviour are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.

Definition of low-level concerns

- The term 'low-level' concern is any concern - no matter how small - 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 such behaviour could include, but are not limited to:
 - Being overly friendly with children
 - Having favourites
 - Breaching the mobile phone and acceptable use agreement/risk assessment
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
 - Humiliating pupils
- Ultimately, any behaviour which raises concerns in relation to the code of conduct should be flagged.

Managing low-level concerns

- The DSL team will regularly raise awareness of the threshold for reporting low-level concerns by training staff on the code of conduct and leading scenario discussions relating to reporting thresholds (including self-referral).
- The reporting procedures outlined in each school's safeguarding policy ensures that low-level concern reporting maintains a high profile across the staff body and that the reporting mechanism is easily accessible and that there are no barriers to disclosure.
- All low-level concerns are logged and categorised by the Headteacher. The Headteacher may share some concerns with the DSL if appropriate to do so. The Headteacher and/or DSL will investigate

concerns or intervene with training/support whenever necessary. They will also monitor patterns and trends over time to ensure there are no hidden/emerging safeguarding concerns.

- After investigation, the Headteacher will decide if a low-level concern reaches the threshold for external reporting to the LADO and/or disciplinary procedures.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018, Data (Use and Access) Act 2025, and the UK GDPR and retained at least until the individual leaves employment at the school.
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.
- We will not include low-level concerns in references unless:
 - The concern (or group of concerns) has met the threshold for referral to LADO and is found to be substantiated; and/or
 - The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

5. Whistleblowing Procedure

Principles/guidance

- This procedure is aligned with [government guidance](#) and the Public Interest Disclosure Act 1998.
- Whistleblowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistleblowing include (but are not limited to):
 - Criminal offences, such as fraud or corruption
 - Pupils’ or staff health and safety being put in danger
 - Failure to comply with a legal obligation or statutory requirement
 - Breaches of financial management procedures
 - Sexual harassment (in effect from 6 April 2026)
 - Attempts to cover up the above, or any other wrongdoing in the public interest
 - Damage to the environment
- Through this procedure, we encourage any individual to report any wrongdoing that is “in the public interest”.
- Whistleblowers should report such suspected wrongdoing as soon as possible, safe in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected.
- Whistleblowers will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue for staff).
- Staff are protected by law and that a non-disclosure agreement, confidentiality clause or ‘gagging clause’ in a settlement agreement or employment contract cannot stop them from making a protected disclosure in the public interest
- Staff whistleblowers are protected by law and should not be [treated unfairly or lose their job](#) because they ‘blow the whistle’. Other whistleblowers can get independent advice if you’re not sure you’re protected, for example from [Citizens’ Advice](#).
- Not all concerns will count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance. Nevertheless, whistleblowers should always report a concern using the procedure they feel is most appropriate/relevant as the concern can always be easily redirected whenever necessary. [Further guidance](#) can support individuals with reporting decision making.

Procedure

- Whistleblowers should use this form [Whistleblowing - Wishford Education](#) to submit their concern.
- Given the serious nature of any wrongdoing warranting a whistleblowing report, it is unlikely that any such incident wouldn’t require alerting Wishford’s leadership team (who can then decide whether to deescalate or delegate the matter in any way). However, any whistleblower can choose to report the matter directly to a senior leader at their setting if they would prefer to do so.
- If there is good reason not to report the matter to Wishford, then a list of prescribed bodies to whom staff can raise concerns with is included [here](#). It is advised that staff seek [advice](#) before reporting a concern to an external body.
- Reports must include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter. The trust will investigate any complaints in a timely, respectful and confidential manner.
- Staff are encouraged to give their name when reporting an allegation, to help the trust take the investigation further. A complainant’s right to anonymity will be respected, however, it may limit the scope of any subsequent investigation.
- The CEO will appoint an investigation lead (or defer the investigation to external agency/independent body/police, who will likely take over the investigation) who will interview the whistleblower (if possible) and consult with the CEO before deciding on the next stages of the investigation.

- The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps, including timeframes. They must be protected from unfair treatment throughout the process.
- The investigating person(s) will prepare a report detailing the findings and confirming whether any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether a referral is required to an external organisation, such as the local authority (LA) or police. They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.
- Beyond the immediate actions, the CEO, trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.
- If a staff member is not satisfied with the way in which their concern has been handled, they can raise their concerns with 1 of the contact points listed [here](#).
- If a whistleblowing allegation is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the person making the allegation.