

Code of Conduct

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Code of Conduct

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Policy

The purpose of this Code is to clarify the standards of conduct expected from all staff in the College, promote consistency, ensure that all staff are aware of their responsibilities whilst engaged in their employment and to set out the implications of non-compliance.

This policy applies to all staff at Craven College including teachers, supply teachers, other staff, volunteers, and contractors.

Links to other Policies:

- Anti-Fraud and Anti-Bribery policy
- Bullying and Harassment Policy
- Staff Performance and Management Policy and Procedure
- Confidentiality, Copyright and Employee Inventions
- Data Protection Policy
- Disciplinary Policy and Procedure
- Equality and Diversity Policy
- Financial Regulations
- Flexible Working Policy
- Grievance Policy and Procedure
- Health and Safety Policy
- Safeguarding Children & Vulnerable Adults Policy and Procedures
- ICT Social and Electronic Media, and Smoothwall Policy
- Whistleblowing Policy

1.0 Introduction

- 1.1 This Code sets out to staff the standards of conduct and behaviours which are expected of them, as well as assisting managers and supervisors to maintain proper standards of discipline at work and, where necessary, to apply the appropriate procedures. The College expects its employees to provide a quality service to its students, to other members of staff, the community and at all times safeguard its reputation.

2.0 Our Behaviours

- 2.1 In addition to the specific behaviours described in this Code, all staff across the College are expected to fulfil their roles, deal with others, and conduct themselves in line with the College's Behaviours which are set out at Appendix 1 to this Code.

3.0 Scope of the Code

- 3.1 This Code must be complied with by all employees of the College and supplements the provisions outlined in the employee's Contract of Employment and Staff Handbook. In instances where cases do not clearly fall within the guidance of this code or the above-mentioned supplementary information, then the case will be decided by the Senior Management of the College with the right of appeal to the Principal or designated Senior Postholder.

- 3.2 Failure to observe the standards of conduct set out in this Code will be regarded by the College as a breach of contract. Any breach of contract renders an employee liable to disciplinary action which may include dismissal.
- 3.3 There is an implied duty of trust which is central to the Contract of Employment of every employee. Any conduct which breaches or brings into question the integrity of employees is potentially very serious. It is important that all employees are aware of the areas of conduct where potential difficulties can arise in order that r issues can be avoided. The sections below cover the main circumstances in which challenges to professionalism, integrity and ethics may be encountered, these are not intended to be exhaustive.
- 3.4 The College and the Governing Board recognises that staff have freedom within the law to question and to put forward new ideas and opinions to management without placing themselves in jeopardy of losing their jobs or status or any other benefits which they may have within the College. (Ref: Instruments and Articles – Article 9)

4. Responsibilities of the Code of Conduct

4.1 Terms of Employment

- i. Each member of staff is expected to abide by the terms and conditions of their employment and to fulfil the requirements of his/her agreed job description. Staff are expected to work flexibly in line with the changing needs of the College.
- ii. Craven College places the safeguarding of our young people at the heart of all its activities, and therefore expects all its staff to conduct themselves in a manner that aligns with the colleges safeguarding Procedures, this applies to behaviour during normal working hours, behaviour outside of the college, and online. The failure to do so will result in the appropriate action being taken under the terms of the Safeguarding Procedure, and may result in action being taken under the College's Disciplinary Procedure
- iii. All employees are expected to conduct themselves in accordance with established College Policies. The failure of any employee to do so may result in action being taken against him/her under the College's Disciplinary Procedure.

4.2 Conduct

All staff are expected to conduct themselves in a reasonable and responsible manner when undertaking their duties and fulfilling their responsibilities and to comply with lawful and reasonable instructions from managers. It is expected that staff display integrity, honesty, and impartiality in all dealings and at work within the spirit of the College's Mission, Vision, Behaviours and Strategic Priorities. Managers are expected to treat all staff fairly, and no less favourably to one another; and with respect and dignity at all times.

4.3 The Prevent Duty

All Staff should understand and abide by the fundamental British values of:

- i. Democracy
- ii. The rule of law
- iii. Individual liberty
- iv. Mutual respect for and

- v. Tolerance of those with different faiths and beliefs, and for those without faith.

Fundamental British Values underpin what it is to be a citizen in a modern and diverse Great Britain valuing our community and celebrating diversity of the UK. Fundamental British Values are not exclusive to being British and are shared by other democratic countries as a way of creating an orderly society, where individual members can feel safe, valued, and can contribute for the good of themselves and others. Staff are expected to challenge any extremist views.

4.4 College Loyalty/Reputation

Staff are expected to act professionally in good faith and in the best interests of the College. It is a disciplinary offence to act in such a way as to bring the College's name into disrepute. This includes dealings with external organisations. In dealings with external organisations, staff should act as "ambassadors" for the College, seeking to promote the services and positive reputation of the College. Staff must not tender for business for their own personal gain. Staff should not engage in any employment activity which would bring the staff member into competition with the activities of the College or conflict with the interests of the College. Part time or full time employees who have additional employment external to the College which may compromise or conflict with their work with the College must discuss the issue with their Line Manager in the first instance for approval.

4.5 Confidentiality

Staff should not divulge to any person, corporation, company, or other organisation whatsoever any confidential information belonging to the College or to any Subsidiary relating to its or their affairs or dealings which may come to the knowledge of the staff member during employment.

Staff should ensure that personal data belonging to an individual is maintained securely and lawfully to protect the rights of the individual, in line with The Data Protection Act 2017.

5. Safeguarding

- 5.1 The safeguarding of all students is the responsibility of all staff, especially those students who are under 17 years' old or vulnerable adults (i.e., High Needs students aged 19-24). Staff should be vigilant regarding safeguarding the College, students, and other staff. Staff are required to act responsibly and take appropriate action to ensure that students learn and work safely in a safe and secure environment where they are protected from abuse by others.
- 5.2 Staff must wear their ID in a clearly visible manner at all times when on College premises and assist with the security of the College by challenging any individual who is not wearing appropriate College ID, by requesting proof of identity (ID card or Visitor Pass), or otherwise directing them to the main reception for assistance.
- 5.3 Craven College promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the College (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. Staff must share their concerns, no

matter how small, they believe this to be about their own or another member of staff's behaviour.

5.4 The college seeks to create an environment where staff are encouraged and feel confident 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 expected professional standards.

5.5. The policy seeks to:

- ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
- empower staff to share any low-level concerns with the Principal
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the LADO
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised
- help identify any weaknesses in the organisation's safeguarding system.

6. Staff/Student Relationships

6.1 Staff will always behave in a professional and respectful manner, maintaining appropriate professional boundaries between colleagues, students, and any other people they may meet while performing their duties, and in accordance with the college's Safeguarding Policies and Procedures.

6.2

Whilst in a relationship of trust employees must not engage in any personal or intimate relationship, including sexual activity with any student towards whom they have a professional responsibility. This will include a child, young person or an adult at risk of harm or in need of protection (irrespective of the age of consent), even if the basis of the relationship is consensual. Although College policy applies specifically to a child, young person or an adult at risk of harm or in need of protection the College does not condone relationships between employees and their students. Employees engaging in such relationships may be subject to disciplinary action which could result in dismissal. Such relationships are not permitted because of the clear conflict with professional responsibilities. Professional responsibilities of staff towards students may be academic (including assessment), administrative or advisory.

If the relationship pre-exists at the point of enrolment of the student, then the member of staff must inform his or her Line Manager/Head of Department so that alternative arrangements can be made in respect of the professional responsibilities for that student.

6.3 As a result of their knowledge, position and/or the authority invested in their role, all staff of the college are in positions of trust in relation to students. This applies to adults as well as younger students. The relationship between a member of staff and a student cannot be a relationship between equals and therefore it is essential that this unequal balance of power is not misused. Staff must maintain appropriate professional boundaries and avoid any behaviour that exploits that position of power, or which may be perceived by others as so doing. Staff's relationships with students must be strictly professional. The development of friendships, relationships and especially sexual relationships would normally be deemed inappropriate, and in the case of the last of these in respect to children and vulnerable adults at risk of abuse or neglect illegal.

6.4 Potential Conflicts of Interest

a) The establishment of an academic relationship with family members or with friends or associates who become students potentially raises both ethical and professional issues for the College.

b) In relationships between members of staff, it is the responsibility of both individuals to deal appropriately with any potential conflict of interest. Any personal relationships which may give rise to a real or perceived conflict of interest, breach of trust or confidentiality should be declared to their Line Manager/Head of Department without delay.

c) In general staff private interests must not be such as to have the potential for allegations of impropriety to partiality to be substantiated thereby bringing the College into disrepute. They should not misuse their official position or information acquired in their official duty to further their private interests or those of others.

6.5 Line Management

Where a personal or intimate relationship exists or develops between members of staff who are in a line management or supervisory relationship at work, they must not be involved in the recruitment, selection, appraisal, promotion or in any other management process involving the other party whereby an unfair advantage may be perceived to be gained from the overlap of a professional and personal relationship.

In all other cases of personal relationships between staff members, the College relies upon the integrity of both parties to ensure that abuses of power do not occur. There is the potential that consensual relationships later become non-consensual and as a result, staff should be aware that the College would not condone the harassment of individuals under any circumstances.

7. Child Protection Legislation

- 7.1 Any personal relationships of an intimate/sexual nature between staff and students, who are 17 years' old or under, is an offence under section 15 of The Sexual Offences Act 2013, even if the relationship is consensual. Any relationship or alleged relationship, of such a nature identified will be treated as gross misconduct under the College's Disciplinary Procedure and reported to external relevant bodies as deemed appropriate by the college, (e.g., Social Services, Police, Local Authority) and will be documented appropriately.
- 7.2 Members of staff should also be aware that any development of a personal relationship with a student before that student is 18 could be considered to be 'grooming' which is also illegal. For this reason, Craven College will consider any personal relationship with a student aged 18 or under as gross misconduct and take action accordingly.
- 7.3 Any member of staff who suspects that there is a personal relationship between a member of staff, and a student who is 18 years' old or under, should report this directly to the College's Designated Safeguarding Lead.
- 7.4 Should a personal relationship of a non-intimate nature exist or develop between a member of staff and a student who is 18 years' old or under, this must be disclosed immediately, in writing to the designated Safeguard Lead, and the Assistant Principal Curriculum. A full risk assessment involving all appropriate and relevant external agencies will take place, e.g., Social Services, to ensure that the relationship is professional and appropriate.
- 7.5 Failure to disclose any such relationship may result in action being taken under the college's Disciplinary procedure.
- 7.6 Teachers, like all professionals, owe a particular obligation / duty of care to all students. Teachers must maintain safeguarding and the delivery of a quality service to students as high priorities. Where teaching falls short of an acceptable standard, a finding of negligence may follow which could result in action being taken under the College's Disciplinary Procedure.

8. Infatuations and "crushes"

- 8.1 All staff need to recognise that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a "crush" or infatuation. They should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.
- 8.2 Any member of staff who receives a report, overhears something, or otherwise notices any signs, however small, that a young person has become or may become infatuated with either themselves or a colleague, should immediately report this to the DSL. In this way appropriate intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

9. Transporting Students

9.1 Staff should not offer lifts to students unless the need for this has been agreed by the DSL, such as in an emergency or where not doing so would mean the child may be at risk. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

10. Low Level Concerns

10.1 A low-level concern is one that does not meet the harm threshold as stated in the College's Safeguarding Policy. The harm threshold is, when anyone working in the college (including volunteers, supply staff and contractors) 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;
- Vulnerable adult

10.2 For dealing with Low-Level Concerns see – Appendix 2

11. Staff Relationships

11.1 Staff must at all times treat colleagues with respect and courtesy. The College's quality and Diversity Policy applies. Staff will be dealt with equitably without bias or discrimination. Staff are expected to work effectively as team members, support colleagues and maintain effective working relationships.

11.2 Where disagreements arise between members of staff in either a professional or non-professional nature, (i.e., college activities related to their areas of work or non-college activities related to personal issues during the normal college day or outside of the normal college day), it is important that high professional standards are maintained at all times and that such issues do not affect the workplace. Any such actions may result in disciplinary action.

11.3 Any employee who has a personal relationship with an employee in their own immediate work team or curriculum area must declare the relationship to their Head of Department, Director, Assistant Principal or Vice Principal, to ensure there is no conflict of interest with regards to, for example, recruitment panels, promotion decisions etc.

11.4 An employee who has a personal relationship with a contractor or supplier must declare the relationship to their Head of Department if the employee's job allows him/her authority over the client, customer, contractor, or supplier (for example if the employee has the authority to decide to whom to award contracts).

11.5 If the employee feels uncomfortable in discussing the above matters with their Department Head, then he/she may inform the Head of HR. The information declared will be recorded and treated in strict confidence.

12. Social Media

- 12.1 The use of social media has the potential to cause damage to the College's reputation. When communicating either in a professional or personal capacity, within or outside the workplace, employees must conduct themselves appropriately.
- 12.2 If such action has a negative impact on the College's operation or reputation, this could result in disciplinary action being taken against the employee. Examples include publishing defamatory and/or knowingly false material about the College, other employees, or students, posting images or comments that are inappropriate, offensive, or discriminatory or links to inappropriate content or doing anything that may conflict with the interests of the College or damage the reputation of the College.
- 12.3 Students may wish to become "friends" with College employees on social media platforms, however to ensure professional boundaries are maintained, employees are encouraged to set up a work profile using their Craven College e mail address and must not accept and/or invite students (including vulnerable students who are adults or children), ex-students under the age of 17 years' old and parents, to become "friends" on personal social media accounts or other online services.
- 12.4 Entering into such relationships may lead to abuse of an employee's position of trust and breach the standards of professional behaviour and conduct expected at the College. The College considers such action a misconduct and reserves the right to take disciplinary action if employees are found to be in breach of this policy, with the potential of dismissal for serious cases of misconduct.

13. Contact with the Press

- 13.1 Any member of staff approached by the media and/or press on any matters relating to the college, must not be responded to, or commented on directly. Any approach made by the media must be referred to the Marketing Manager, and/or a member of the Senior Management Team.

NB: This does not infringe the rights of staff under the Whistleblowing Policy, which encourages employees to raise genuine concerns relating to some danger, fraud or other illegal or unethical conduct connected with the workplace without fear of reprisal or victimisation.

14. Dress Code

- 14.1 Employees are required to dress appropriately based upon their role and responsibilities when working within the workplace, working outside of the workplace and when representing the College. It is acknowledged by the College that what is appropriate may vary depending upon the location at which the employee is working, the activities that they are undertaking and the people they may be meeting (in person or virtually) on a given day.
- 14.2 All employees are required to be neat, clean, and tidy during working hours, whether working on the College's premises or elsewhere, presenting a positive image of the College. Some areas of the College require specific corporate work wear and/or PPE which must be adhered to. The College will provide PPE and corporate work wear where applicable.
- 14.3 Although employees have some freedom in expressing themselves in dress, the management of the College have the discretion to judge what is and is not appropriate.

- 14.4 The College recognises the diversity of cultures and religions of its employees and will take a sensitive approach when this affects dress and corporate work wear requirements. However, priority will be given to health and safety, security, and other similar considerations.

15. Employees Required to Wear Corporate Work Wear

- 15.1 Certain Departments are required to wear specified mandatory corporate work wear which will be agreed with the Line Manager and purchased by the College. e.g., Hair & Beauty, Catering, Facilities.
- 15.2 Employees who are required to wear mandatory corporate work wear must ensure that they do so during working hours, unless advised otherwise by their Line Manager. Work wear must always be clean and worn in a presentable fashion. The work wear issued must not be altered in any way without the College's permission and must include the correct College logo.
- 15.3 Work wear remains the property of the College. Employees must take responsibility to ensure that good care is taken of garments and return any work wear issued on the termination of employment.

16. Employees Required to Wear Personal Protective Equipment (PPE)

- 16.1 Line Managers, in conjunction with Senior Managers will specify and agree mandatory College PPE requirements which will be purchased by the College. PPE should be selected based primarily on the hazards identified during the assessment.
- 16.2 Employees who occupy roles that require PPE e.g., hard hats, masks, and gloves, are required to wear this clothing while carrying out their duties whenever required by law or by college rules or identified by risk assessment. Under the Personal Protective Equipment Regulations 2022 all employees have a responsibility to ensure they wear/utilise appropriate PPE provided to them as identified in college risk assessments.
- 16.3 In addition, any employee whose job involves working with machinery/working with food must keep his/her hair either short or tied back and must not wear any jewellery other than a wedding ring. These rules are in place for safety/hygiene reasons. Catering employees are instructed not to wear false nails, nail polish, perfume, and excessive jewellery in food preparation areas.
- 16.4 All PPE remains the property of the College. Employees must take responsibility to ensure that good care is taken of garments and return any work wear issued on the termination of employment.

17. Gifts and Hospitality

- 17.1 Employees should exercise care and discretion in offering and accepting gifts and/or hospitality. Employees must be careful when exercising their duties not to show by their behaviour that they may be influenced by gifts and /or hospitality whilst acting in an official capacity. (The Prevention of Corruption Acts 1906 and 1915 make it a criminal offence for employees to demand or accept any gift or reward in return for allowing themselves to be influenced in their official capacity by any person – including a student – seeking to obtain a

contract or favourable treatment by the employer). Please refer to point 17 of this code of conduct regarding Fraud and Bribery.

- 17.2 Staff may accept gifts and /or hospitality of modest value such as diaries and pens etc. and may accept refreshments and food arising while on College business or dinners when representing the College but must not accept corporate hospitality or entertainment designed by third parties to reward or influence staff of the College with whom they are conducting business or purchasing goods and services.
- 17.3 Gifts received from students can be accepted if they are modest and represent small tokens of appreciation and gratitude. It is very important that on internally assessed courses that any gift cannot be perceived or portrayed as possibly having an influence on assessment decisions. The same would apply to the completion of references for students.
- 17.4 Gifts and hospitality over the value of £50 must be declared and added to the Gifts Register maintained by the Director of Governance. If a member of staff is concerned about a gift they should refer and discuss the matter with their Line Manager. If in doubt the gift should be registered. The Gifts Register will be reviewed annually by the Governing Body.
- 17.5 Any member of staff or governor wishing to dispense hospitality must obtain authorisation by a Budget Holder.
- 17.6 Hospitality must only be dispensed if it is in connection with college business and if the persons receiving the hospitality are from outside the College. The exception being members of the Governing Body and its Committee meetings.

18. Fraud and Bribery

- 18.1 The College has a zero -tolerance approach to bribery and corruption whether attempted or actual. The College's reputation with the community it serves, and other stakeholders is underpinned by ethical behaviour, financial probity, and honesty.
- 18.2 All employees and associated persons are responsible for maintaining the highest standards of conduct and are expected to always behave honestly and with integrity.
- 18.3 The College prohibits employees and anyone acting for, or on behalf of, the College ("associated persons"), including Governors, other volunteers, temporary workers, consultants, and contractors from offering, giving, soliciting, or accepting any bribe, and/or committing any fraud. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are a public official/body or private person or company, by any individual governor, employee, agent or other person or body acting on the College's behalf.
- 18.4 Employees and associated persons are requested to remain vigilant in preventing, detecting, and reporting bribery/fraud. Employees and associated persons are expected to report any concerns regarding any suspected bribery/fraud in accordance with the College's procedures contained in the Whistleblowing Policy.

19. Disclosure of Business Interests

- 19.1 Employees who are associated with businesses/interests with whom the College may potentially transact must disclose these interests for the record to the Director of Governance and/or to the Vice Principal – Finance and Resources. This also applies to spouses/partners/close relatives of staff.

20. Timekeeping

- 20.1 The College expects high standards of attendance and timekeeping from all staff. Employees are expected to arrive at their place of work within the College on time to enable them to fulfil their contractual obligations and any necessary advance preparations to ensure the delivery of a quality service.
- 20.2 If absent through sickness or for any another reason, employees must speak to their Line Manager at the earliest opportunity before the start time or by 8.30am in order that any necessary arrangements can be made (e.g., class cover for tutors).

21. College Property

- 21.1 In order to preserve the quality of the College's environment and physical resources, staff must ensure that they and students, for whom they are responsible, look after college premises and property. Staff should also ensure energy is conserved wherever possible (e.g., turning off lights when not in use and computers at the close of business); and the security of college property is maintained as far as possible and not put at risk.

22. GDPR and Data Security

- 22.1 All Craven College employees are expected to abide by the College's Data Protection Policy and the eight key principles as set out below:

- Principle 1: Personal data shall be processed fairly and lawfully.
- Principle 2: Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Principle 3: Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Principle 4: Personal data shall be accurate and, kept up to date.
- Principle 5: Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Principle 6: Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction, or damage.
- Principle 7: Accountability – Craven College must demonstrate that the six Data Protection Principles (outlined above) are met for all personal data for which it is responsible
- Principle 8: Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

23. Flexible Working

- 23.1 Staff are required to adhere to the published Flexible Working guidelines.
- 23.2 Employees who are working from home flexibly are subject to the same rules, procedures and expected standard of conduct and performance as all other employees. Contractual obligations, duties and responsibilities remain in place, as do our workplace policies.

OUR BEHAVIOURS



Appendix 2 – Low Level Concerns - Safeguarding

Defining a Low-Level Concern

A low-level concern is one that does not meet the harm threshold as stated in the College's Safeguarding Policy. The harm threshold is, when anyone working in the college (including volunteers, supply staff and contractors) 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 he or she 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 (which includes behaviour that may have happened **outside** college posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within section 7 of the college's Safeguarding Policy, 'Procedure for Managing allegations against Staff'. These should be reported to the principal without delay.

A low-level concern is **any** concern – **no matter how small**, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e., they believe it could be a concern) – that an adult working in or on behalf of the 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.

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

- Being over friendly with students.
- Having favourites.
- Taking photographs of students on their mobile phone.
- Using inappropriate sexualised, intimidating, or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is intended to enable abuse.

Responsibilities of staff

It is important that all staff are clear of the expectations the college stipulates from them as contained in the Staff Code of Conduct. This is covered as part of the college's induction for new staff.

It is crucial that any concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Principal. This should be done without delay.

Where there are concerns/allegations about the Principal, this should be referred to the Chair of Governors.

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been in contrary to the college's code of conduct and expectations, they self-refer to the Principal.

Dealing with Low-Level Concerns

All low-level concerns may be shared verbally with the Principal in the first instance but must then be recorded in writing. The record should include:

- Details of the concern
- The context in which the concern arose
- Action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Where the low-level concern is provided verbally, the Principal should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above. Records will be signed, timed, and dated.

Records will remain confidential in accordance with the college's Data Protection policies and GDPR.

Responding to a Low-Level Concern

The Principal will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher-level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:

- a. The threshold is met for a higher-level concern/allegation
- b. There is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- c. There is other information which when considered leads to a higher-level concern/allegation.

Where the Principal is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis. Having established that the concern is low-level, the Principal will discuss it with the individual who has raised it and will take any other steps to investigate it, as necessary. If the concern has been raised via a third party, the Principal should collect as much evidence as possible by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the college's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the college's HR manager.

Monitoring of Low-Level Concerns

The Principal will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the college's Senior Management Team monthly to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- (a) the concern (or group of concerns) has been reclassified as a higher-level concern, or
- (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the college's grievance, capability, or disciplinary procedure