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Windrush Valley Prep School and Nursery

Policy Documents Annual Review Record

Citation	This document shall be cited as: **Staff Code of Conduct including Low Level Concerns Policy** and must be read in conjunction with the linked following policies and documents: KCSIE 2026 Child Protection and Safeguarding Policy Allergy Safety and Anaphylaxis Management Policy Planning Policy Marking and Feedback Policy Curriculum Policy Assessment Policy Intimate Care and Toileting Policy Behaviour Management Policy Restrictive Intervention Policy Allegations against a member of staff Staff Disciplinary Policy Resolving Grievance procedures Whistleblowing Policy Online Safety Policy (including Acceptable Use and Artificial Intelligence) Visiting Speaker Policy Data Protection Policy Data Protection Parent and Pupils Privacy Notice
Person responsible	Headteacher
Comments to	Headteacher
Last reviewed/updated	October 2026
To be reviewed/updated	October 2027
Reason for review/update	Annual update
Person reviewing/updating	Lucy Maudsley, Headteacher
Source/author	Lucy Maudsley
Implementation	On recorded approval; existing safeguarding duties continue
Approved by	Previous approval: R Higgs, March 2026. Revised policy approval: T Mullins, October 2026

This Code sets the standards adults must follow to protect children, maintain professional relationships and carry out their work responsibly. It applies to all staff and, as relevant to their role, supply staff, volunteers, contractors and others working on behalf of the School. Teaching expectations apply to staff with teaching responsibilities.

How to use this Code

This code must be read in conjunction with the linked policies listed above. Detailed operational procedures remain in the linked policies and documents. All staff must read KCSIE 2026 Part One and complete required induction and updates.

1. Professional conduct and appearance

- Put children's welfare, development and progress first.
- Treat pupils, families and colleagues with kindness, dignity and respect.
- Challenge bullying, discrimination and prejudice, maintain inclusive practice and take reasonable steps to keep pupils safe.
- Work cooperatively with colleagues and external professionals, seek advice when needed and respond constructively to feedback.
- Staff with management responsibilities must treat colleagues fairly and respectfully, provide appropriate guidance and feedback, support professional development and respond promptly to concerns.
- Maintain honest and accurate records, qualifications, communications, assessment and examination practice. Check information before signing documents.
- Use School property, funds and systems responsibly. Declare conflicts of interest and obtain prior written Headteacher consent before undertaking other employment, including private work for School families.
- Maintain professional conduct outside work and online. Do not act in ways that compromise pupil welfare or suitability to work with children.

Dress and presentation

- Clothing must be clean, professional and appropriate to the role and activity, allowing safe movement and supervision.
- Footwear, jewellery and accessories must be safe.
- Suitable PE, outdoor and protective clothing may be worn for relevant duties.
- Do not display offensive, discriminatory or party-political slogans.
- Expectations will be applied fairly, respecting religion or belief and disability and making reasonable adjustments where required.
- Ask the Headteacher if uncertain.

Fitness and suitability

- Do not work with pupils while under the influence of alcohol or drugs.
- Tell the Headteacher confidentially if medication or a health condition may affect safe working.
- Report promptly any circumstances that may affect suitability, including relevant criminal or safeguarding matters, restrictions and applicable childcare disqualification.
- Concerns about the Headteacher follow section 6.
- Staff must not smoke or vape on School premises, in School vehicles or in the presence of pupils, including on visits and other School activities.

Accountability

- Follow School policies and reasonable instructions.
- Report mistakes, unsafe practice and boundary concerns promptly, including your own.
- This Code cannot cover every situation: use professional judgement, prioritise the child and seek advice.
- Breaches may result in safeguarding, disciplinary or contractual action.
- Gross misconduct may result in dismissal following a fair process.
- Staff must attend punctually, fulfil their agreed working hours and follow the School's procedures for reporting sickness and requesting leave.

2. Planning, teaching and assessment

Teachers are accountable for the quality of their teaching and pupils' progress. Follow the School's Planning, Marking and Feedback, Curriculum and Assessment policies and the expectations of Excellence in Every Lesson (Appendix A), adapting practice to pupils' age and needs.

Planning and subject knowledge

- Know the subjects and curriculum you teach, maintain pupils' interest and address misconceptions. Keep relevant professional knowledge current.
- Build on pupils' prior knowledge, capabilities and emerging needs. Use an understanding of how children learn and develop to plan appropriate next steps.
- Plan well-structured lessons with clear learning purposes and effective use of time. Promote curiosity and a love of learning; contribute to an engaging, coherent curriculum.
- Set homework and other activities in accordance with School arrangements to consolidate and extend learning. Promote literacy, articulacy and appropriate use of standard English across subjects.

Meeting individual needs

- Adapt teaching and assessment for pupils with SEND, disabilities, EAL and higher attainment.
- Understand barriers to learning, provide appropriate support and challenge, implement agreed plans and reasonable adjustments, and seek specialist advice when needed.
- Encourage independence and pupils' responsibility for their work.

Assessment, feedback and reporting

- Use formative and summative assessments and meet relevant statutory assessment requirements.
- Use assessment information to monitor progress, identify support or challenge, set suitable targets and plan subsequent teaching.
- Give useful, timely oral and written feedback, including accurate marking under School arrangements, and opportunities for pupils to respond and reflect.

- Maintain accurate planning, assessment and pupil records. Communicate honestly and professionally with parents about achievement, progress and wellbeing.

Professional development and curriculum sensitivity

- Review the effectiveness of lessons and approaches, respond constructively to feedback and seek support or training.
- Handle sensitive curriculum content through approved, age-appropriate resources and planned learning purposes.
- Answer questions professionally within School arrangements; seek guidance where uncertain and report disclosures through safeguarding procedures.
- Do not introduce inappropriate discussion of personal experiences.

3. Professional boundaries and communication

Adults occupy positions of trust. Relationships with pupils must remain professional in and outside School, including online. Report any concern immediately under section 6; do not wait for proof or a criminal offence.

Boundaries and social contact

- Do not favour, isolate or manipulate a pupil, encourage secrecy, use humiliating or sexualised language..
- Do not give pupils personal phone numbers, email addresses or social-media details. Use approved School accounts and channels for professional communication.
- Do not have current pupils or former pupils under 18 as personal social-media friends or contacts. Declare pre-existing family or close personal connections so appropriate boundaries can be agreed.
- Avoid online friendships with School parents that blur professional boundaries. Where relationships already exist, maintain confidentiality and professional conduct.
- Use approved School channels for professional communication with parents and carers, rather than personal email, WhatsApp, texts or social-media accounts. Pre-existing personal relationships do not authorise confidential School business through private channels.
- Do not arrange private meetings with pupils away from School or outside authorised provision. A pupil must not visit your home through your professional role without an established reason and prior Headteacher and parental agreement.

One-to-one work

- Plan and risk assess one-to-one teaching, pastoral support and meetings through School arrangements.
- Use visible, accessible spaces, maintain suitable visual or auditory contact with others and ensure another colleague knows the arrangement.
- Avoid secluded settings. Review safeguards for the activity and child; report any situation that could be misunderstood.

Attachments, gifts and online conduct

- Report pupil infatuations, dependency or misunderstood contact promptly to the Headteacher. Do not encourage attachment or react insensitively.
- Raise concerns about your own or another adult's boundaries and obtain support.

- Small, occasional tokens of appreciation may be accepted.
- Do not accept significant or repeated gifts, inducements or anything creating an expectation of preferential treatment; seek advice if unsure.
- Do not give personal gifts to pupils.
- Rewards must follow School arrangements, including WINDRUSH360, and be fair and appropriately recorded.
- Selection for teams, performances, trips and responsibilities must follow clear, fair criteria; exclusion must not be used to humiliate a child.
- Keep personal online activity consistent with professional boundaries and confidentiality.
- Do not post confidential, abusive or discriminatory material or content raising concerns about suitability to work with children.
- Official School social media may be managed only by authorised staff.
- Do not share personal gaming identities with pupils or play privately online with them. If accidental contact occurs, end the interaction and report it promptly to the DSL.
- Review privacy settings to reduce unintended contact.

4 Contact, care, behaviour and activities

Physical contact and privacy

- Contact must meet the child's needs and be appropriate to the role, activity, age and development. Explain and seek cooperation where possible; listen to verbal and non-verbal responses.
- Use the minimum contact needed in an open, accountable way.
- Contact must never be secretive, for adult gratification or an abuse of authority.
- Report and record contact that causes concern or could be misunderstood.
- Age-appropriate reassurance and support in PE, music or other practical activities may be appropriate.
- Regular support should follow agreed plans where needed.
- Respect privacy during changing and swimming while providing suitable supervision and preventing bullying.

Intimate care and medical support

Children in any year group may need toileting, changing or other intimate care.

- Authorised, competent staff must follow School procedures as outlined in the Intimate Care and Toileting Policy and individual care plans, protect dignity, use suitable hygiene precautions and encourage independence.
- Explain the care, seek cooperation and arrange for another adult to know it is taking place and for support to be available. Record care as required and report concerns.
- Do not delay essential care because a need was unforeseen or the child did not ask.
- Follow first-aid, medication and individual healthcare procedures.
- Work within competence and training, obtain qualified help and emergency services when necessary, and record treatment.
- Emergency action must not be delayed while seeking routine permission.

Behaviour and restrictive intervention

- Treat pupils with dignity.
- Corporal punishment, degrading treatment, intimidation and demeaning sarcasm are prohibited.

- Use agreed behaviour strategies and rewards as outlined in the Behaviour Management Policy and WINDRUSH360.
- Use prevention, de-escalation and support where safe.
- Any force must be lawful, necessary, proportionate and for the shortest time needed; never use it as punishment.
- Consider SEND, disability, medical needs, communication and trauma and make reasonable adjustments.
- Follow the School's Restrictive Intervention Policy and procedures and the DfE guidance effective April 2026. Seek appropriate training and assistance.
- Report interventions promptly, record significant incidents and seclusion, inform parents and review support as required.
- Any safeguarding concern follows section 6.

Transport, visits, clubs and residentials

The same conduct and position-of-trust standards apply throughout visits and clubs, including residentials.

- Follow approved risk assessments and supervision arrangements.
- Transport must be authorised in advance with appropriate parental agreement and role-appropriate checks.
- Prefer approved alternatives to private cars where practicable.
- Vehicles, drivers, insurance, seat belts and child restraints must meet legal and School requirements.
- Do not offer informal lifts outside agreed duties.
- Record and report emergency transport to the Headteacher and parents promptly.

5. Information photography technology and AI

Confidentiality and information security

- Use personal information only for authorised work and share it on a lawful, need-to-know basis.
- Follow UK GDPR, the Data Protection Act 2018, applicable Data (Use and Access) Act 2025 provisions, privacy notices and the retention schedule.
- Safeguarding information must be shared promptly through the appropriate route; confidentiality must not prevent necessary protection of a child.
- Store records in approved secure systems.
- Off-site access or School business on personal devices needs approved security arrangements.
- Protect credentials, use required Multi-Factor Authentication (MFA) and lock unattended devices. Report loss, misdirected messages, unauthorised access or disclosure immediately to the Headteacher and Data Protection Lead/DPO.
- Pass media or legal enquiries to the Headteacher, except when exercising a lawful reporting or disclosure right.

Photography and personal devices

- Nursery and Reception: use school-owned devices only; personal-device permission never applies. Years 1–6: use school-owned devices, or a named personal device with prior written Headteacher approval under Appendix 1.

- Check the authorised purpose, lawful basis and School image permissions; consent is not the only possible lawful basis.
- Respect children's wishes, avoid identifying pupils alongside public images and consider risks of copying, manipulation and misuse.
- Do not take photographs in a one-to-one situation.
- Keep personal devices switched off or silent and securely stored while working with children.
- Personal use is limited to breaks away from children or expressly approved arrangements.
- Emergency use must be limited to what is necessary.
- Follow the Online Safety Policy for transfer, deletion, device security and visitors.
- Do not bypass filters, install unauthorised software, share credentials or access unlawful, pornographic, abusive or discriminatory material.
- Do not search for, copy or forward suspected child sexual abuse material; report it immediately.

Monitoring and staff AI use

- Monitoring must be lawful, necessary, proportionate and transparent, with purposes, scope, access and retention explained through privacy and acceptable-use information.
- Staff retain privacy rights; signing this Code is not blanket consent to monitoring.
- Any checks on authorised personal-device photographs must exclude unrelated personal content.
- Use only AI tools and purposes approved by the Headteacher and recorded in the AI Register after appropriate advice.
- Use generic prompts: never enter identifiable pupil, parent or staff data, safeguarding records, medical/SEND details, pupil images or confidential correspondence or security information.
- Add personal details afterwards in approved systems.
- Check accuracy, bias, suitability and copyright.
- Pupils must not use generative AI for School activities.
- AI must not make safeguarding decisions or solely automated decisions with legal or similarly significant effects.
- Report incidents promptly.
- This Code currently approves no named platform.

6. Reporting concerns and allegations

Report promptly to the right person

- Concern about a child: contact the DSL or deputy immediately and follow the Child Protection and Safeguarding Policy. Record through approved arrangements; an electronic record on CPOMS alone is not enough for urgent action.
- Concern about an adult, including your own conduct: report to the Headteacher promptly. This includes supply staff, volunteers and contractors and concerns arising outside work.
- Concern about the Headteacher: report directly to the Chair of Governors or proprietor, without first informing the Headteacher. Where reporting creates a conflict involving the sole proprietor, contact the LADO directly.
- If the relevant person is unavailable, action is not taken or a child remains at risk, use the alternative and external routes in the Safeguarding and Whistleblowing procedures. Anyone may refer directly to children's social care or police. Call 999 in an emergency.

When the harm threshold may be met

The allegations procedure applies where an adult has or may have

- harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards children in a way indicating a risk of harm;
- behaved in a way indicating they may not be suitable to work with children, including outside work.

The Headteacher, or appropriate case manager when the Headteacher is involved, must follow the Child Protection and Safeguarding Policy, consult the LADO promptly and make required referrals. Staff must not investigate allegations or delay reporting while seeking proof. Where the threshold is uncertain, the case manager seeks LADO advice. Do not promise absolute confidentiality.

Whistleblowing and staff protection

- Raise unsafe practice, failures to act and concerns about organisational culture through the Whistleblowing Policy procedure.
- Staff may use appropriate external routes, including where internal reporting is unsuitable or ineffective.
- Nothing in this Code prevents a protected disclosure, police report or safeguarding referral.
- Concerns raised honestly will be addressed fairly; statutory whistleblowing protection applies where its conditions are met.
- Report cyberbullying or harassment of staff to the Headteacher, or the appropriate governance route if the Headteacher is involved.
- The School will respond through relevant safeguarding, behaviour or staff procedures.
- Follow the School's Visiting-speaker and Prevent procedures. Uphold fundamental British values: democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.
- Visiting speakers require prior approval, appropriate checks and supervision under School arrangements.
- Follow the Safeguarding Policy on Female Genital Mutilation (FGM). Teachers must personally report to the police known cases of FGM in girls under 18 identified in their professional work through the girl's disclosure or visual evidence, subject to the statutory exception where another teacher has already reported. Inform the DSL as well; reporting only to the DSL does not discharge the police-reporting duty. Do not examine a child to establish FGM. Report suspected or at-risk cases to the DSL promptly.

What should be reported

Examples include humiliating or discriminatory treatment, inappropriate language, favouritism, secrecy, unnecessary isolation with a child, inappropriate social contact, unauthorised photography, misuse of confidential information and behaviour that breaches professional boundaries.

A concern can be reported even when it is only a sense of unease.

7 Low-level concerns procedure

Meaning and reporting

A low-level concern is any concern, however small, that an adult working in or on behalf of the School may have acted inconsistently with this Code but the behaviour does not meet the harm threshold. "Low-level" does not mean insignificant. Examples include being over-familiar, having favourites, inappropriate language, unauthorised photographs and secluded one-to-one contact.

- Report promptly using section 6; it is never too late.

- Self-report situations that could be misunderstood or conduct that falls below expectations.
- The Headteacher is the ultimate decision-maker and may consult the DSL.
- Concerns about the Headteacher go to the Chair or proprietor. T
- he case manager seeks LADO advice where the threshold is uncertain or a pattern may meet it.
- Concerns about supply or contracted staff must also be shared appropriately with their employer so patterns can be identified.

Recording, responding and reviewing

To record low-level concerns, use Appendix 2 or report verbally without delay.

Record the concern, context, date, time and reporter's identity unless anonymity is requested.

The recipient records verbal concerns.

Send completed records securely to the appropriate recipient; never save them in an all-staff folder.

Anonymity will be respected as far as reasonably possible but cannot be guaranteed.

Treat information and access requests lawfully, with DPO advice where needed.

Respond promptly and fairly.

Gather relevant information from the reporter, individual and witnesses, subject to LADO/police advice.

Give the individual an appropriate opportunity to respond without prejudicing safeguarding enquiries.

Record the assessment, conversations, decisions, reasons, actions and follow-up.

Outcomes may include explanation, guidance, training, support, disciplinary action or referral.

Seek HR/legal advice where appropriate.

Review records periodically and whenever a new concern is received.

Consider patterns about an individual and wider cultural issues.

Where a pattern may meet the harm threshold, consult the LADO and follow the Allegations procedure.

Record reviews and address training or policy weaknesses. Provide proportionate feedback and suitable support.

Security, retention, references and oversight

- Keep records centrally and securely, with access limited to those who need it.
- Retain them at least until the individual leaves and then for the period justified by the School's retention schedule, safeguarding needs and DPO advice; do not automatically destroy them on departure.
- Allegation records follow the separate KCSIE retention rules. Record retention and disposal decisions.
- Low-level concerns are not normally included in references unless they concern matters normally included, such as misconduct or poor performance.
- Exclusively safeguarding concerns below the harm threshold must not be included.
- Substantiated safeguarding allegations meeting the threshold follow KCSIE reference requirements. References must be factual and fair.
- Governors/proprietors receive proportionate, usually anonymised assurance about implementation, patterns and actions.

8. Allergy awareness

- Follow the School's Allergy Safety and Anaphylaxis Management Policy, individual healthcare plans and all communicated allergy precautions and food restrictions, including those applying to staff food, treats, celebrations, cooking activities and educational visits.
- Know the allergy information relevant to your role. Check ingredients before providing food or using activity materials, prevent food sharing and cross-contamination, and seek advice if unsure.
- Complete required training and know how to access emergency medication and assistance. Follow individual emergency plans and School procedures, and report any suspected reaction, exposure or breach of allergy precautions immediately.

Staff acknowledgement and agreeance form- Google Form: https://forms.gle/ZMfr2szbANoHDVHi7

By completing the linked Google Form, you confirm you have read, understood and agree to follow this Code. You will also adhere to the linked policies, procedures and reporting routes.

Appendix A


WINDRUSH VALLEY PREP SCHOOL AND NURSERY
EXCELLENCE IN EVERY LESSON
Clear, Consistent, Child-Centred
A WARM WELCOME
Every child is greeted positively and feels known, safe and ready to learn.
READY TO LEARN
Resources are prepared, routines are calm and learning begins promptly.
REVISIT & REMEMBER
A short retrieval activity recalls prior learning and gives every child an early success.
CLEAR LEARNING
Children know what they are learning, why it matters and what success looks like.
QUALITY FIRST TEACHING
Teaching is engaging, ambitious and inclusive. Modelling, chunking and scaffolding make learning clear and manageable.
CHECK & RESPOND
Questions, observation and pupil work check understanding and help teaching adapt straight away.
POSITIVE LEARNING ENVIRONMENT
Effort, kindness and responsibility are noticed. Expectations are fair, consistent and respectful.
REFLECT & FINISH WELL
Children review their learning. Books, resources and the room are left ready for what comes next.
Inspiring Excellence – Building Character – United in Purpose
EFFORT • KINDNESS • RESPONSIBILITY

Personal device photography permission Appendix- 1

For Years 1–6 only. This form never authorises personal-device photographs or videos of Nursery or Reception children.

Staff name: _____
Device and identifying details: _____
Purpose and activity: _____
Permission period or event: _____

Staff agreement

- Use only the named authorised device for the agreed educational or promotional purpose and follow pupil image permissions.
- Protect the device with appropriate security and a secure screen lock. Prevent personal apps and automatic photo synchronisation from accessing pupil images.
- Transfer images securely to G Drive – All Staff – Class photos within one working day.
- After verified transfer, immediately delete all personal-device copies, including recently deleted folders and any synchronised cloud copies.
- Report loss, unintended sharing or security concerns immediately.
- Permit necessary, proportionate checks limited to authorised School photographs and their transfer/deletion arrangements. Unrelated personal content will not be inspected.
- Understand that permission may be withdrawn and misuse may lead to safeguarding or disciplinary action.

Staff signature: _____ Date: _____

Headteacher approval: _____ Date: _____

Store the completed approval securely in the employee's record. The Online Safety Policy and this Code apply throughout the permission period.

Low level concern reporting form Appendix 2

Report urgent concerns immediately. Do not wait to complete this form. Send it securely to the Headteacher, or the appropriate recipient under section 6. Do not store completed forms in shared staff folders.

Reporting person and role	
Recipient	
Date and time reported	
Date time and location of concern	
Person or people involved	
Facts context and concern	
Immediate action or support	
Reporter signature and date	

Recipient completion

Record securely with this form: information gathered; individual's response at the appropriate stage; threshold assessment and LADO advice; links to earlier concerns; decisions and reasons; action, owner and review date; support and feedback; final outcome. Use a protected continuation record if needed.

Recipient signature: _____ Date: _____