BETHANY SCHOOL CODE OF CONDUCT POLICY
Including Disciplinary Procedure and dealing with Low Level concerns

October 2026

INTRODUCTION

Bethany School seeks to provide a safe and supportive environment for all staff, pupils and volunteers. We aim to protect the well-being of everyone involved and achieve the very best outcomes for pupils in our care. This document provides a guide for those working in Bethany school about acceptable and desirable conduct to protect both adults and pupils. It refers to and complements other policies and guidance, including: Safeguarding Policy, Online Safety Policy, Staff Recruitment Policy, Whistleblowing Policy, Keeping Children Safe in Education, Guidance for safer working practice for those working with children and young people in education settings (https://www.saferrecruitmentconsortium.org/_files/ugd/f576a8_0d079cbe69ea458e9e99fe462e447084.pdf)

Local Sheffield Guidance: Sheffield Children Safeguarding Partnership - People in Positions of Trust

and
Sexual Offences Act 2003 (Abuse of position of trust)

All school staff are role models and are in a unique position of influence and must adhere to behaviour that sets a good example to all the pupils within the school. As a member of a school community, each staff member has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours.

We believe the school will function more effectively and harmoniously as an organisation if all employees work with common purpose and values. Roles which have significant leadership or representative responsibilities, e.g. governors and teaching staff, or that are central to fulfilling the aims and purposes of the school both internally or externally, or developing and maintaining our Christian ethos, will usually be held by committed evangelical Christians. This does not apply to parent governors or volunteers, who do not need to be Christians.

The school is committed to its staff, to their development both professionally and spiritually and has a duty of care towards each member of the team. The school is committed to act in all circumstances with the best interests of pupils in mind and with compassion, grace and pastoral concern. Members of staff are encouraged to make every reasonable effort and intention to meet the standards of personal conduct and working practice set out in this code of conduct.

A culture of vigilance is critical within the school. All concerns about adults (including allegations that do not meet the harm threshold - see KCSIE) should be shared responsibly and with the right person, recorded and dealt with appropriately. An open and transparent culture will enable the school to identify concerning, problematic or inappropriate behaviour early; and minimise the risk of abuse. A culture of vigilance will help to ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.
Any behaviours that fall short of the guiding principles outlined in the document *Guidance for safer working practice for those working with children and young people in education settings* must be shared responsibly and with the right person. All concerns that do not meet the harm threshold must be recorded and dealt with appropriately as a low level concern as referenced below and in *Keeping Children Safe in Education.*

All staff are expected to familiarise themselves and comply with all school policies and procedures including those mentioned above.

This Code of Conduct applies to all employees of the school. This Code of Conduct does not form part of any employees' contract of employment.

SETTING AN EXAMPLE

All staff who work in schools set examples of behaviour and conduct which can be copied by pupils. All staff must, therefore, demonstrate high standards of conduct in order to encourage our pupils/students to do the same.

This code helps all staff to understand the high standards of conduct that we expect, and what behaviour is not acceptable in Bethany School as a result of our shared beliefs and values.

SAFEGUARDING PUPILS

Staff have a duty to safeguard pupils from physical abuse, sexual abuse, emotional abuse, and neglect

Concerns about the safety or welfare of a pupil must be reported without delay to the Designated Safeguarding Lead (DSL) or Deputy DSL. Safeguarding concerns or allegations about an adult working in or on behalf of the school must be reported in accordance with the Procedures for Managing Allegations Against Adults and the Low-Level Concerns Policy, to the Headteacher

The school's DSL is Mr. D Charles

Staff must be familiar with the school's Safeguarding and Child Protection Policies and Whistleblowing Procedure.

Staff must also understand the distinction between concerns about a child, which are reported to the DSL or Deputy DSL, and concerns about an adult, which follow the school's adult-concern procedures.

Staff must not intimidate, humiliate, discriminate against, sexualise or form inappropriate emotional dependencies with pupils. They must avoid favouritism and conduct that could reasonably be perceived as grooming, coercive or exploitative. Racism, faith-targeted abuse and other prejudice-based or discriminatory behaviour must be challenged and reported where it raises a safeguarding concern.

Staff should not demonstrate behaviours that may be perceived as sarcasm, making jokes at the expense of pupils, embarrassing, or humiliating pupils, discriminating against, or favouring pupils.

Staff must take reasonable care of pupils under their supervision with the aim of ensuring their safety and welfare.

SAFER WORKING PRACTICES

The following are examples of behaviours we would expect to find within the staff team at Bethany School:

- Willingness to give account of a living faith in Jesus Christ within settings and context appropriate to day to day responsibilities;
- Regular commitment and participation in the life of a local church;
- Treating one another with grace, respect, courtesy, politeness, forgiveness and Christian love;
- Honesty and co-operation in our interactions, timekeeping and work practice;
- Respect for authority and for individual conscience and diversity as people working together;
- Commitment to good stewardship of the school's finance and resources;
- Avoiding the use of inappropriate or offensive language;
- Avoiding putting themselves at risk of allegations of abusive or unprofessional conduct by maintaining professional standards of behaviour and appropriate boundaries at all times. This includes relationships between themselves and the pupils, parents and colleagues and avoiding behaviour which could be misinterpreted by others.
- familiarising themselves and complying with all school policies and procedures.

The school also has regard to the *Guidance for safer working practice for those working with children and young people in education settings 2022* underpinning principles as follows:

- The welfare of the child is paramount.
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils.

- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles.
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded.
- Staff should discuss and/or take advice promptly from the Head Teacher if they have acted in a way which may give rise to concern.
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief, and sexual orientation.
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children.
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action, and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the Teaching Regulation Agency (TRA).
- Staff and managers should continually monitor and review practice to ensure this guidance is followed.
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and their local authority safeguarding procedures.

DISQUALIFICATION

Disqualification under the Child Care Act applies to staff themselves who work in a childcare capacity, whether paid, volunteer or are on work placements.

Relevant staff are those working in childcare, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside school hours.

All staff **must** declare if they are disqualified from providing or being directly concerned in the management of childcare under the Child Care Act**.**

Under the 2018 Regulations, schools are not required to establish whether a member of staff is disqualified by association because of another person living or working in the same household.

All staff must nevertheless inform the school where their relationships or associations, within or outside the workplace including online, may have implications for the safeguarding of children or for their suitability to work with children.

If circumstances change, staff must inform the Headteacher, including any previously undeclared change of name or any matter relevant to childcare disqualification or safeguarding suitability.

RELATIONSHIPS WITH PUPILS

Bethany School accepts that many of our pupils, staff, families and volunteers know each other in a social context through church or other (often family) relationships. We view this as a strength and a core part of our aim to support parent's active participation in Bethany School. Staff should make such relationships known and not assume that the school is aware of such connections.

However relationships with pupils must be professional and unbiased at all times. Physical relationships with pupils are not permitted and may lead to a criminal conviction.

Professional contact with pupils must be via school authorised mechanisms ie school email addresses and google classroom. Personal telephone numbers, email addresses or communication routes via personal accounts on social media platforms must not be used to communicate with pupils.

If contacted by a student by an inappropriate route, staff should report the contact to the Head Teacher immediately.

PUPIL DEVELOPMENT

Staff must comply with school policies and procedures, collaborate with colleagues and with external agencies and follow reasonable instructions that support the well-being and development of pupils.

HONESTY AND INTEGRITY

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

All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise, or give financial advantage or other advantage to someone; or if they request, agree, or accept, or receive a bribe from another person. If you believe that a person has failed to comply with the Bribery Act, you should refer to the Whistleblowing procedure.

Gifts to teachers from suppliers or associates (including students or parents) of the school must be declared to the Head Teacher with the exception of “one off” token gifts from students or parents.

Financial gifts towards the work of the school are passed from the Head teacher to the school treasurer and recorded in the school budget.

CONDUCT OUTSIDE OF WORK

Staff must not engage in conduct outside work, including online conduct, which could seriously damage the reputation or standing of the school, undermine professional trust or indicate that they may pose a safeguarding risk or be unsuitable to work with children.

Staff must promptly disclose to the Headteacher any arrest, charge, conviction, caution, investigation, relationship, association or other change in circumstances that may have implications for safeguarding or their suitability to work with children, subject to applicable law and school procedures.

Staff may undertake work outside school, either paid or voluntary, provided that it does not conflict with the interests of the school nor be to a level which may contravene the working time regulations or affect an individual's work performance in the school.

Outside employment, volunteering, private tutoring, relationships and online activity must not compromise professional boundaries or create an unmanaged safeguarding conflict. Any relevant conflict or safeguarding implication must be declared to the Headteacher.

ONLINE SAFETY, TECHNOLOGY AND COMMUNICATIONS

Staff must use technology in a safe, responsible and professional manner and comply with the school’s Online Safety Policy, Acceptable Use arrangements, and data-protection requirements. This applies to school and personal devices, online services, messaging, social media, artificial intelligence tools and other current or emerging technologies. Staff must not enter confidential, personal or safeguarding information into a generative AI service unless its use has been expressly approved by the school for that purpose.

Staff must not use social media, messaging services or other online platforms in a way that breaches confidentiality, professional boundaries, safeguarding expectations or the law, or that could reasonably bring the school or professional role into disrepute. Staff should use appropriate privacy and security settings on personal accounts but must recognise that online activity may still become public.

Staff must maintain professional boundaries in all online activity, including posts, comments, reactions, images, video, livestreaming, dating services and other digital interactions. Staff must not seek out, follow, connect with or communicate privately with pupils through personal accounts. Any accidental or

inappropriate online contact with a pupil must be reported in accordance with school safeguarding procedures.

Electronic communication with pupils and parents/carers must use school-approved accounts, systems and devices where required by school policy. Staff must model and support the school's mobile-phone arrangements and should use personal devices during the school day only in accordance with school policy and for authorised purposes.

Images, audio or video of pupils may only be created for authorised school purposes, using school-approved equipment or systems and in accordance with the school's Online Safety Policy, privacy information and data-protection arrangements. Staff must not use personal devices to create or store images of pupils unless expressly authorised by a school procedure. Images and recordings must be stored, shared and deleted only through approved school systems and in accordance with the school's lawful basis and retention arrangements

CONFIDENTIALITY

Where staff have access to confidential information about pupils or their parents/carers, it must only be shared on a lawful and need-to-know basis and in accordance with the school's safeguarding, information-sharing and data-protection procedures.

Confidentiality must never prevent appropriate safeguarding action. Staff must not discuss sensitive information with people who do not need to know it, but the DSL, Headteacher or another authorised person may share information with parents or carers, other professionals or agencies where this is appropriate and lawful. Data-protection law does not prevent the sharing of information for the purpose of keeping children safe.

Staff must share any information that gives rise to concern about the safety or welfare of a pupil with the DSL or Deputy DSL without delay. Staff must never promise a pupil absolute confidentiality and should explain that information may need to be shared with people who can help keep them safe.

DRESS AND APPEARANCE

All staff must dress in a manner that is compliant with professional standards and promotes a positive and professional image.

Staff should dress in a manner that is not likely to be viewed as offensive, revealing or sexually provocative and does not distract, cause embarrassment or give rise to misunderstanding.

Staff should dress in a manner that is absent from political or other contentious slogans.

In online engagement, clothing should be similar to the clothing worn on a normal school day.

LOW LEVEL CONCERNS

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their behaviour or that of another member of staff, volunteer, supply teacher, trainee teacher, contractor or other person working in the school. Its purpose is to help create and embed a culture of openness, trust, and transparency in which the precise values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (2022) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

Definition
A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- does not meet the Bethany School Code of Conduct
- is inconsistent with the "Guidance for safer working practice", including inappropriate conduct outside of work, and

- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

Examples may include, but are not limited to:
- being overfriendly with children
- having favourites
- taking photographs of children on a personal mobile phone contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating children
- using inappropriate language or communication; or
- other behaviour which causes a sense of unease or appears to cross appropriate professional boundaries

Reporting low-level concerns
- Where a low-level concern has been identified this will be reported as soon as possible to the Head Teacher. However, it is never too late to share a low-level concern if this has not already happened.
- Where the Head Teacher is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (i.e., the most senior member of SLT acting in this role).
- Low-level concerns about the Head Teacher will be reported to the Safeguarding Governor as the Designated Safeguarding Lead and the Head Teacher in Bethany School are the same person.
- Where the low-level concern has been reported to the Designated Safeguarding Deputy, they will inform the Head Teacher of the details as soon as possible.

Recording concerns
- A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.
- Where concerns are reported verbally to the head teacher a record of the conversation will be made by the head teacher which will be signed, timed, and dated.

For further details see appendix 1 'responding to low level concerns'

DISCIPLINARY PROCEDURE

Staff should be aware that a failure to comply with this Code of Conduct could result in disciplinary action including but not limited to dismissal.

The Governing Body of Bethany School is committed to ensuring that all staff at the school should be treated in a consistent, fair and sensitive manner. Bethany School is committed to act, in all situations, with compassion, grace and pastoral concern, and make decisions based on these and the best interests of its pupils. Some issues may be as the result of incapacity or an error of judgement rather than lifestyle choice, and Bethany School undertakes to respond in such a way as to encourage restoration.

It is expected that, wherever possible, problems of indiscipline will initially be dealt with through informal means. Where such intervention has not led to the desired improvement or the matter is sufficiently serious to warrant immediate formal action, further steps will be taken.

While the use of disciplinary procedures should always be viewed as a last resort, in no way do they exempt Bethany School from making every possible effort to safeguard the best interests of pupils, to encourage high standards of conduct, or to model good working relationships that convey respect for people and property.

Definitions

Misconduct which may warrant action includes:
- Poor timekeeping or persistent lateness
- Unauthorised absence from work
- Unauthorised use of the school facilities including the Internet.
- Wilful failure to comply with a reasonable instruction from a member of leadership

- Persistent minor breaches of health and safety requirements
- Foul or abusive language
- Sexual or racial harassment which is not sufficiently serious to fall into the category of 'gross misconduct'.

Gross misconduct includes:
- Unauthorised removal of school property
- Serious sexual or racial harassment
- Offences of dishonesty
- Serious breaches of health and safety requirements
- Sexual offences
- Serious criminal offences which undermine the employee's ability to perform his/her job
- Sexual misconduct at work
- Persistent wilful failure to comply with a reasonable instruction from a member of leadership
- Fighting
- Physical assault
- Actions which bring the school into serious disrepute
- Drunkenness.
- Falsification of time sheets, subsistence and expenses claims etc.
- Theft
- Malicious damage to the school's property.

Issues of misconduct may be raised by way of a complaint against staff by a member of the school community in which case the separate Complaints Policy document should be read and followed in conjunction with this Policy.

As with any disciplinary investigation, employees will be treated within a context of grace and compassion while time is taken to consider the circumstances of the situation, e.g.
- the severity of the perceived misconduct;
- whether the incident is a 'one-off' or part of repeated behaviour
- any mitigating circumstances, e.g. personal issues
- the position of trust of the employee within Bethany School
- Christian maturity and understanding
- the treatment of similar instances of misconduct by other employees
- evidence of repentance.

It is understood that while every member of staff is vulnerable to behaviour which contravenes that laid out in Scripture, our desire as an organisation is to inspire, encourage and build one another up in the faith in order to honour, obey and glorify God in our work.

COMPLIANCE

This code of conduct will form part of our school safeguarding training and induction for new staff. A sign sheet record will be kept to demonstrate staff have understood and agree to comply with this code of conduct.

Policy Adopted by Governors on: October 2026

Policy Due for Review: 2028

Appendix 1: Responding to Low level concerns

All staff and volunteers are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- does not meet the Bethany School Code of Conduct
- is inconsistent with the "Guidance for safer working practice", including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO. (See KCSIE Part 4)

Reporting low-level concerns

- Where a low-level concern has been identified this will be reported as soon as possible to the Head Teacher. However, it is never too late to share a low-level concern if this has not already happened.
- Where the Head Teacher is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (i.e., the most senior member of SLT acting in this role).
- Low-level concerns about the Designated Safeguarding Lead will be reported to the Headteacher and those about the Head Teacher will be reported to the Safeguarding Governor.
- Where the Designated Safeguarding Lead and the Head Teacher are the same person, all concerns will go directly to the Safeguarding Governor.
- Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Head Teacher of the details as soon as possible.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.
Where concerns are reported verbally to the head teacher a record of the conversation will be made by the head teacher which will be signed, timed, and dated.

Responding to low level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The head teacher will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,
    i) is consistent with the "Guidance for safer working practice for those working with children and young people in education settings" : no further action will be required,
    ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken,
    iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from relevant bodies. In this case the school's Managing Allegations procedure within the Safeguarding Policy will be followed.
    iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation, and referred to the LADO or Police: a referral should be made to the LADO and advice taken from relevant bodies. In this case the school's Managing Allegations procedure within the Safeguarding Policy will be followed.
- Records will be made of,
    i) all internal conversations including any relevant witnesses,
    ii) all external conversations e.g., with the LADO
    iii) the decision and the rationale for it,
    iv) any action taken

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is

not possible e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (i.e., self-report)?
It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the "Guidance for safer working practice"
Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

Should the low-level concerns file be reviewed?
The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

References
Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

What is the role of the Governing Body?
The Head Teacher will regularly inform the Governing Body about the implementation of the low-level concerns policy including any evidence of its effectiveness e.g., with relevant data. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.