

drb Ignite Multi Academy Trust

Staff Code of Conduct Policy

Trust Vision

The drb Ignite Multi Academy Trust has been established through a shared belief that lives can be transformed by what goes on in schools. We believe that the process of teaching and learning shapes futures. Our vision is that:

All pupils achieve the highest standards of educational standards regardless of circumstance or background.

Rationale

School staff are role models and are in a unique position of influence. The Trust expects all staff to demonstrate positive behaviours that set a good example to pupils at all times. As a member of a school community, the Trust believes that every staff member, whatever their role, has an individual responsibility to act professionally whether inside or outside working hours.

This *Staff Code of Conduct* applies to all staff employed by the Trust in whatever capacity.

In addition to this Policy, all staff employed under ***Teachers' Terms and Conditions of Employment*** have a statutory obligation to adhere to the DfE Teachers' Standards 2011 (updated July 2021) Part 2 – Personal and Professional Conduct.

General Expectations

Application and Intent

All Trust staff are expected to act professionally in accordance with this *Staff Code of Conduct*. Any breach of the *Staff Code of Conduct* may result in disciplinary action.

All staff are expected to comply with the law as it applies to their work in the Trust or a Trust school, particularly in matters such as health and safety, safeguarding of children and data protection. Staff are also expected to carry out their duties in accordance with the relevant policies, procedures, rules and guidance adopted by the Trust Board.

The Trust consults staff and recognised trade unions and professional associations about the adoption or variation of its policies and procedures and associated guidance. It expects school headteachers to consult staff and unions/professional associations as appropriate in relation to the general management of Trust/school business and organisation.

Personal Interest

Staff should not abuse their position in the Trust or a Trust school to confer an advantage or disadvantage on any person or obtain an advantage for themselves, whether financial or otherwise. They must not allow personal interests to interfere with their work in the Trust or a Trust school.

Staff should not use their position in the Trust or a Trust school to advocate any one religion, culture or political ideology to pupils. It is the direct responsibility of all staff

to uphold **British Values** as defined in law from time to time and the Trust's own operating values.

To avoid any doubt or unwarranted suspicion staff should tell the Trust/school about any personal interest which might compromise or be seen as compromising their position in the Trust/school. If in doubt about what should be declared they should seek advice from the Trust leadership team.

Examples of personal interests include:

- situations in which the staff member's job e.g. as headteacher or school business manager could unduly influence decisions on contracts into which the Trust/school has entered or is proposing to enter, or where a staff member has a personal or financial interest in any of the contracts, either directly or indirectly e.g. through a partner or relative.
- where a staff member holds a position with an external company or organisation, whether paid or unpaid, which may lead to a conflict of interest. (Examples include directorships of companies, serving on bodies such as charities, voluntary groups, governing bodies of other educational establishments.)
- if a staff member has a close personal relationship with a person who has influence over the staff member's employment with the Trust/school or whose employment the staff member could influence or control.

Safeguarding and duty to report *low level concerns*

Staff should not conceal any matter which it is their duty to report to the Trust/school or appropriate public body. This includes their duties in relation to the safeguarding and welfare of children. The Trust has a strong *culture of safeguarding* as set out in the *Safeguarding and Child Protection Policy* and in line with *Keeping Children Safe in Education 2021 (KCSiE)*. This can be viewed on the Trust website and individual school websites.

An important part of the Trust's safeguarding culture is the reporting of ***low level concerns***. These are defined as:

Any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- *is inconsistent with the Trust's **Staff Code of Conduct**, including inappropriate conduct outside of work*
- *does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.*

For more information refer to the Trust's Safeguarding *Low Levels Concerns Policy* or speak directly to your headteacher or a Trust senior executive leader.

Gifts and hospitality (see separate Trust Gifts, Hospitality and Bribery Policy)

The offer of any gift or hospitality, whether from outside or inside the Trust/school, which might be interpreted as an attempt to influence a staff member in his or her conduct towards pupils, parents or colleagues or influence a decision around provision of a service must be treated with caution. Staff should seek advice if in any doubt. The Trust acknowledges that pupils, parents or colleagues often wish to make small gifts (such as sweets) to staff members on specific occasions (such as Christmas or at the end of the school year) and sees the spirit of giving as one to be nurtured in children and which demonstrates the Trust's values.

Any offer of a gift or inducement, whether made at specific occasions or casually, should be declared to the Trust/school, if the gift is made by, or indirectly by, a person, firm or organisation which, to the knowledge of the staff member, has, or seeks to do, business of any kind with the Trust/school or to have an interest in its decisions.

The receipt of minor articles, often by way of trade advertisements, as unsolicited gifts for the Trust/school rather than for personal use (e.g. diaries, calendars, office requisites, etc., which are customarily distributed at Christmas and, occasionally, at other times) is acceptable. Where there is any doubt, staff should seek guidance from the Trust before accepting any gifts or hospitality offered.

Staff should also take advice before making any gifts to external organisations, or to the employees of such organisations, which either provide services to the Trust/school or which are potential providers of such services. They should recognise that gifts could put themselves and/or the employees of those organisations in a difficult position.

Sponsorship

The Trust Board is responsible for approving all sponsorship and will provide guidance to staff on their involvement with any sponsorship, actual or proposed. Staff approached directly by actual or potential sponsors should refer any proposals to their line manager or head teacher for determination in the first instance.

Where the Trust or a Trust school sponsors an event or service, such sponsorship must comply with the **Academy Trust Handbook** and any other ESFA financial regulations, so that there is no improper benefit to the Trust or its trustees, staff and pupils, including any partner, spouse or relative of any trustee, pupil or employee of the Trust.

General Confidentiality

Staff are required to comply with the law on data protection, GDPR and freedom of information and observe the Trust policies and procedures for dealing with personal information about other staff, pupils, families or members of the public. Staff must ensure they do not pass on any confidential, personal information received or obtained through their employment to anyone, whether inside or outside the Trust/school, or to any organisation not entitled to that information, and must not use such information for personal advantage. Staff should seek guidance from the Trust/headteacher if they are uncertain as to whether or not information can be passed on to another person or organisation. The Trust, as data controller in law, is responsible for ensuring that the necessary guidance on Trust procedures for complying with GDPR law is made available to staff, including the arrangements for storing confidential information, whether held on paper or electronically.

Whistleblowing (see separate Trust Whistleblowing Policy)

Staff considering making a disclosure under the *Public Interest Disclosure Act* should ensure that they first inform themselves of the law and of the Trust's policy on the Act and take advice. The Trust's *Whistleblowing Policy* can be found on the Trust and individual school websites.

Dealing with School Money

Staff must ensure that public funds are used in a responsible and lawful manner and in compliance with the Trust's financial internal controls and procedures. In Trust schools, staff should refer all parents to the main school office rather than accept money from parents in payment for trips or dinners directly.

Criminal Charges and Convictions

A staff member must notify the Trust/headteacher if charged with, or convicted of, any criminal offence, or in receipt of a formal police caution, and should do so as soon as possible after the charge, caution or conviction. If a headteacher is the subject of a charge he/she must inform the Trust CEO. Depending on the circumstances, failure to inform may result in disciplinary action.

The Trust acknowledges that a caution is not a criminal conviction, but staff must be aware that cautions have to be declared during Disclosure and Barring checks unless they meet the filtering rules of the *Disclosure and Barring Service*.

The Trust acknowledges that a staff member charged with an offence is innocent until proved guilty.

However, special considerations will apply if the offence is one of those which is on the list of offences relevant to safeguarding (a full list is available on the Disclosure and Barring Service's website) or if a staff member is imprisoned on remand pending trial.

Information given to the Trust will be treated with strict confidence and stored securely in the same way as other confidential personal information, having regard to the guidance from the *Disclosure and Barring Service* on the length of time for which particular kinds of information should be stored.

Other Employment

Staff should ensure that any additional employment does not conflict with their capacity to fulfil their contract of employment with the Trust.

Contracts of employment for staff require them to inform their Trust line manager/head teacher if they work for another employer and the number of hours which they are required to work for that employer. If their contract of employment with the Trust is the primary employment contract then the head teacher/line manager may refuse permission for other employment where a conflict of interest exists, or the number of hours worked has implications for the health and safety of pupils, or there are significant implications for the Trust school's duty of care to its pupils/staff.

Staff undertaking other employment must not use Trust/school time or equipment for that purpose without the permission of the Trust/school.

Staff in any doubt should ask the Trust for advice.

Intellectual Property and Copyrights

All intellectual property rights, (that is copyright, design rights and the right to patent inventions) relating to anything created or invented by staff in the course of their duties belong automatically to the Trust.

Unless otherwise agreed, staff cannot exploit the rights to any such thing without written permission from the Trust CEO.

The Trust may agree to a school collaborating with other schools to create or invent intellectual property to be shared with other schools.

Publications and Dealing with the Press

Staff must not make comments to the press or other media, including social networking sites, on behalf of the Trust or any of its schools unless specifically

authorised to do so. by. Where requests for comments are received they must be passed on to the Trust/ head teacher.

Staff should not publish any material which brings the Trust or a Trust school into disrepute.

Staff may make disclosures of public interest to other appropriate organisations or the press (whistleblowing) provided that such disclosures meet the legal requirements of the *Public Interest Disclosure Act* and should take advice from their union or *Public Concern at Work* before doing so.

If staff wish to publish a professional article unconnected with the Trust/school, then the article should not link them directly to the Trust/school.

Equipment and Materials

Staff must not use the equipment and premises of the Trust/school, or of other places where they work during their contract of employment, for unauthorised purposes. If they are permitted to use equipment, premises or materials for private purposes, the use must not interfere with the work of the Trust/school and they must pay any costs incurred, including costs of paper and printing. They may make personal telephone calls if necessary in their own time, paying for the cost of the call if they use a telephone belonging to the Trust/school.

Permission for use of any facilities will be on the understanding that the use is reasonable.

Union facility time agreements permit the use of telephone with reasonable privacy if available, with payment of outgoing calls, also use of printing and word processing equipment, where available, for union work within the Trust/school provided that this does not interfere with the work of the Trust/school and subject to payment for the materials used.

Political, Philosophical or Religious Neutrality

The Trust/school will not concern itself with the political, philosophical or religious beliefs of individuals.

Staff may not display party political posters, including party political election material, in the Trust offices/school, unless it is part of the curriculum or used as a teaching aid (for example, in a lesson on citizenship).

Equal Opportunities

The Trust/school is committed to the promotion and implementation of equal opportunities. This is evident in the Trust's operating values and *Equality and Diversity Statement and Policy*.

The Trust/school aims to ensure that everyone who comes into contact with it is treated equally, and with courtesy and respect, and not in any way disadvantaged by factors which could prevent the implementation of fair policies and operations.

The Trust expects all staff to uphold its approach to equal opportunities and to accept the duty not to discriminate, either in employment practices or in the provision of facilities and services by reference to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Recruitment and Selection

When making appointments staff should follow safer recruitment practices at all times. This will ensure:

- appointments are made on the basis of a fair recruitment and selection procedure
- their personal preferences do not influence judgements made.
- their interest is declared where related to an applicant or having a close personal relationship outside school with an applicant.
- They adhere to the statutory guidance in ***Keeping Children Safe in Education 2021*** (or the latest statutory guidance).

Alcohol, Illegal Substances and Medication

The Trust/school accepts that alcohol is legally and freely available and acknowledges that some illegal substances are also readily obtainable. Staff are not expected to use illegal substances. Staff must ensure that the use of alcohol out of working time does not adversely affect their work performance. The Trust will not accept staff arriving at work under the influence of alcohol or illicit drugs and whose ability is impaired in any way by reason of the consumption of alcohol or illicit drugs or who consume alcohol in contravention of the Trust's policy on the consumption of alcohol or take illicit drugs on Trust premises.

Staff are expected to follow the Trust's policy on the consumption of alcohol on Trust premises or during working time off the premises.

The Trust recognises that alcoholism and other addictions are illnesses and that staff should be offered appropriate support through managing attendance procedures. The Trust/school will also consider the effects of legally prescribed drugs or certain types of medication on the performance of staff and deal with these under managing

attendance procedures. This may involve undertaking a risk assessment where necessary and taking occupational health or other specialist advice as appropriate.

Staff who are prescribed a type of medication which they have not taken before should make themselves aware of possible side-effects. In accordance with their duty to take reasonable care of their own and their colleagues' health and safety they should advise the Trust/school if the medication starts to affect their ability to do their job or travel safely to work, or if there is a likelihood that this will happen. The Trust/school should undertake risk assessments and take occupational health or other specialist advice as appropriate.

Health and Safety

Staff have a duty to take reasonable care of themselves and to cooperate with the Trust under the *Health and Safety at Work Act 1974*. These responsibilities are identified in the Trust's *Health and Safety Policy* which is available on the Trust website.

Staff are required to act at all times in such a way as to take reasonable care of their own safety and that of others. Any action which potentially puts at risk the health and/or safety of themselves or others will be viewed seriously and may be investigated under the Trust's disciplinary procedure. Staff may also face criminal prosecution for serious breaches of health and safety legislation.

Attendance

Trust contracts of employment contain the main terms and conditions of employment with the Trust.

Staff should follow the Trust/school requirements for reporting absence due to sickness and for helping the Trust/school ensure that it has a record of all persons on the premises and of any approved overtime working.

It is expected that staff are available for work during the hours specified in their contract and take appropriate breaks during the working day.

Smoking

The Trust is a non-smoking educational organisation. No-one is permitted to smoke in any of the class rooms or educational spaces, or any other building owned or occupied by the Trust, at any time. Staff are not permitted to smoke outside on site, including playgrounds and carparks. Smoking in contravention of the above may result in disciplinary action.

Dress

The Trust expects that dress will be appropriate to the nature of the duties and responsibilities of the job and to any health and safety considerations e.g. the wearing of jeans is not considered appropriate attire for a professional in the Trust. The Trust values and welcomes the ethnic diversity of its workforce and dress codes will take account of ethnic and religious dress preferences with sensitivity ensuring that employees are free to observe them, subject to the needs of pupils' education.

Identity Badges

There is a general expectation that staff issued with identity cards/badges will carry them at all times in the Trust office/ school and when they represent the Trust/school. The Trust/school expects staff to wear identity badges in order to assist pupils and visitors at certain times and to maintain the Trust's *culture of safeguarding*.

Trust disciplinary, capability and grievance procedures (see separate policies for detail)

The Trust has formal procedures for staff discipline, capability and grievances. These are available on the Trust website.

Following Instructions

Staff are expected to follow all reasonable and proper instructions by a person with the authority in Trust/school to issue such instructions unless:

- there is a danger to an individual's health and safety.
- they are in conflict with British Values as defined in law.
- there is good reason to believe that the instructions are improper, for example by conflicting with the safeguarding of children, trust policies, financial regulations or other aspects of the law.

The headteacher and line managers within the school/Trust must be able to justify their instructions and decisions in line with their delegations, authority, and Trust/school policy and procedures, and be open and respond promptly to questions.

Pupil Welfare

Physical Contact

Physical contact may be misconstrued by a pupil, parent or observer. Touching pupils, including well intentioned informal and formal gestures such as putting a hand on the shoulder or arm, can, if repeated regularly, lead to questions being raised. Staff must

not make gratuitous physical contact with pupils and should avoid attributing *touching* to their teaching style as a way of relating to pupils.

However, the Trust recognises there will be occasions when physical contact will be acceptable. In general, this is to:

- prevent harm or injury to a pupil or to others.
- prevent a pupil causing injury to him/herself
- to safeguard children

Further advice is contained in the DfE document *Use of Reasonable Force in Schools* - July 2013.

Comforting a Pupil in Distress

There is no easy definition of what is acceptable. Much will depend on the circumstances, the age of the pupil, the extent and cause of the distress and the alternative means of providing comfort. Staff need to use their professional judgment and discretion in relation to these factors. Staff should consider how others might perceive their action, even if no one else is present and ensure that it does not develop into unnecessary contact. Particular care must be taken in instances involving the same pupil over a period of time.

Unavoidable Contact

This is a particularly sensitive issue in particular curriculum subjects such as physical education and drama and in some forms of skills coaching. All staff should be alert to the possibilities of misinterpreting any contact. To avoid such misunderstanding all planned contact must be demonstrably unavoidable.

There are occasions when physical contact may be questioned even if innocent or unintentional. Staff should therefore ensure that their actions recognise the possibility of misinterpretation and are open to the scrutiny of colleagues. Individual professional judgments will be required about the level of physical contact with individual children, which will take account of their age, circumstances and background.

Corporal Punishment

Any form of physical punishment is prohibited under Trust disciplinary procedures and potentially actionable in law. This also applies to any form of physical response to

misbehaviour, with the exception noted above. The Trust also recognises the impact of verbal abuse and does not condone excessive shouting at individual pupil's or groups.

Private Meetings with Pupils

Private meetings, by their very nature, provide opportunities for pupils to make malicious allegations. Staff must therefore recognise this possibility and plan such meetings accordingly. It is advisable to avoid remote areas of the school and to ensure that wherever possible doors are left open or visual contact with others is maintained. In some cases, it will be advisable for another pupil or adult to be present or in a position to minimise risk during a meeting. Under no circumstances should meetings with individual pupils be arranged off the school premises without the prior approval of the head teacher or any senior colleague with delegated authority to approve such meetings. This includes the transporting of individual children in private cars.

Pupils with Additional Needs

If pupils require assistance with toileting staff should consider whether it would be possible to arrange for the presence of another adult in the vicinity. Where this is not possible staff should discuss with their headteacher what arrangements will be reasonable in all the circumstances. The headteacher may refer the matter to the relevant agency or Trust CEO for further advice.

First Aid

The existence of any life threatening, or serious condition will determine the suitability and necessity of physical contact. In the absence of such justification staff who administer first aid should ensure that, wherever possible, other children or another adult can be present if there is any doubt over the possibility of any physical contact being misconstrued.

Comments and Discussions with Pupils

Staff should avoid comments to or about pupils which could be taken to have sexual overtones. It is equally unacceptable for staff to encourage debate and discussion between groups of pupils, which could be interpreted as having sexual overtones, which are not justified in the context of the teaching programme. Curriculum plans should highlight particular areas of risk and sensitivity. This will also call for the exercise of careful judgment in responding to any questions raised by pupils.

Notwithstanding the advice given above it is recognised that, in order to discharge particular pastoral responsibilities, staff may need to engage in conversations with pupils which cover sensitive matters. Staff should use their professional judgment to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the pupils concerned.

Staff must also use their discretion to ensure that, for example, any probing for details cannot be construed as unjustified intrusion.

In responding to individual pupils' distress, staff need to consider carefully whether they should offer advice, sympathy or counselling if a discussion enters a sensitive area or, alternatively, refer them to a colleague or agency who is better placed to offer appropriate advice.

The persistent and hurtful use of sarcastic, demeaning or insensitive comments towards pupils may also be regarded as a form of abuse which is potentially very damaging and should be avoided.

Infatuations and Crushes

These unfortunately do develop and can involve pupils and staff of both sexes on both a heterosexual and homosexual basis. They need to be handled sensitively. Careless and insensitive reactions have been known to provoke false accusations. In such situations the advice of the headteacher should be sought. Other members of staff have a part to play, too, in alerting a colleague to the possibility of an infatuation in order that appropriate steps can be taken to minimise hurt and distress and the risk to the staff member concerned. Whilst the risk of infatuation is not limited to younger members of staff, newly qualified teachers must recognise their particular vulnerability to older pupil's infatuation.

Conduct Outside Work

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity. The more relaxed relationships that may promote successful activities can be misinterpreted by pupils. It is important to emphasise that the standards of professional conduct and behaviour expected of staff should be no different to that which applies within school. Staff should be aware of the particular care, which should be taken with older, more mature pupils in these circumstances.

Teaching Materials

The use of books, videos and films of an explicit or sensitive nature, particularly in relation to language or sexual behaviour must be given careful consideration to ensure that its selection is not subsequently misinterpreted. There should always, therefore, be a link with the objectives of the teacher's scheme of work/ curriculum programme/relationships policy.

Reporting Incidents

Staff should report any concerns they may have following any incident where they feel actions may have been misinterpreted. This report should be made to the headteacher as soon as possible after the incident and should include as an immediate follow-up the preparation of a written note of the incident, a copy of which should be given to the headteacher. Staff may also wish to seek advice from his/her professional association. Headteachers who face similar situations are advised to contact the Trust's CEO.

Whilst reporting of incidents is always advisable it is particularly important to ensure that a contemporaneous written record is made if any form of restraint has been used against a pupil or whenever a pupil, parent or third party has complained about an action or expressed an intention to complain.

Confidentiality

Where staff have access to confidential information about pupils or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil.

However, staff have an obligation to share with their manager or the school's Designated Safeguarding Lead (DSL) any information which gives rise to concern about the safety or welfare of a pupil. Staff must never promise a pupil that they will not act on information that they are told by the pupil.

At some point staff will have to process personal information of pupils and other staff. With the introduction of the new *General Data Protection Regulation (GDPR)*, comes the stipulation that all staff must process the personal information in-line with the new GDPR Data Protection Principles. These principles are outlined in the *Trust Data Protection Policy*. Any concerns should be raised with the Trust's *Director of Privacy and Data Protection Officer*: dpo@drbignitemat.co.uk.

ICT Usage

This section should be read in conjunction with the Trust's *eSafety and Acceptable ICT Use Policy*. Staff, in direct contact with pupils, should not use personal mobile phones. Personal mobile phones should only be used in areas of school premises where pupils are not present. Staff must not use personal mobile phones as a camera in school.

Any photograph/video should be taken using school equipment. Staff must use school computers only to save images.

Staff must not use a Trust/school ICT system to knowingly display, access, extract, store, distribute, print, reveal or otherwise process any kind of image, document or other material which is sexually explicit, or contravenes any other aspect of Trust policy on electronic communications (e-safety). Such activity would be a violation of Trust policy and may lead to disciplinary action.

Staff should apply the same standards to electronic communications as the Trust expects from other forms of communication. All electronic communications must include the correct use of privacy settings, in order to prevent members including the public, colleagues, parents and pupils seeing any personal information. They must also comply with relevant law on discrimination, data protection and protecting the health of staff.

Personal letters

It will rarely be appropriate for staff to write personal letters or to send e-mails to individual pupils. If a staff member believes it to be necessary to write a personal note to a pupil, this should be discussed with a senior colleague, who should refer to the headteacher or DSL if further advice is required.


This advice is not intended to curtail the use of e-mail where a school has agreed the use of this medium for submission of work, advice over aspects of subjects being covered or other professional matters and have ensured that parents and carers are aware of school policy. However, staff using e-mail in this context need to be aware of the less formal style that can characterise this form of communication and should ensure that responses do not convey an inappropriate tone. In particular, a friendly and chatty style committed to e-mail can easily be misconstrued by the recipient as the *conversation* is effectively private to just two individuals, with all that this implies.

Password security

Staff should keep passwords secure and ensure that no other person can gain access to their e-mail account. Ideally, both staff and pupils should use an e-mail address provided as part of a school's internet service, even if they are sending messages while working at home. Since these services can be monitored, they provide a measure of

protection for both parties. Trust schools should implement a code of conduct in which pupils and adults understand what to do if they receive inappropriate e-mail messages from any source.

This Policy will be reviewed every 2 years, or as necessary in line with annual updates to KCSiE.

Monitoring and review	<ul style="list-style-type: none"> Staff conduct will be monitored by individual Headteachers and their leadership teams.
Links	<ul style="list-style-type: none"> Safeguarding and Child Protection Policy Whistleblowing Policy Data Protection (GDPR) Policy Acceptable ICT Use Policy Grievance Policy Disciplinary Policy
Staff responsible	<ul style="list-style-type: none"> Headteachers Line managers
Committee responsible	Trust Board
Committee responsible	Trust Board
Reviewed	Oct 2021
Next review	Sept 2022
Sign off by Chair of Trust	 <p style="text-align: right;">Date: Oct 2021</p>

*Please note that should there be any changes/further national guidance issued relevant to this policy, it will be updated accordingly prior to the review date shown above and referred to the next Trust Board meeting.

Issue No.:	Change date:	Change description:
1.0	Nov'16	Initial release
2.0	Nov'18	Rebranded, updated and signed off for release
3.0	Nov'19	Reviewed
4.0	Jun'20	Reviewed and signed off for release

5.0	Sept'21	Reviewed in line with KCSiE 2021
6.0	Oct'21	Reviewed to include KCSiE 2021 'low level concerns'