



Belonging and Behaviour Policy

(with Positive Behavioural Support Appendix)

Date ratified	January 2024
Committee Responsible for Policy	Children, Families and Community (Ratified by FGB)
Date to be updated	January 2025
Headteacher Signature	
Chair of Governors/ Committee Signature	

Growing together as children of God

At Holy Trinity C of E Primary School:

- we want our pupils to **grow** in confidence, independence, resilience and knowledge, so that all achieve their full potential and develop a life-long love of learning and of the world around us.
- we work **together** with families, community and church to model positive relationships, supporting each other and acknowledging that we are stronger when we work together.
- we are growing together as **children of God**, strengthening our faith, secure in the knowledge we are unique, loved and cherished

Biblical Basis

Galatians 5:22-23

But the fruit of the Spirit is love, joy, peace, patience, kindness, goodness, faithfulness, gentleness, self-control; against such things there is no law.

I Introduction

- 1.1 At Holy Trinity Primary School we believe in adopting a positive approach to our *Belonging and Behaviour Policy*. Every member of staff is familiar with both our *Belonging and Behaviour Policy*, principles and our *Anti-Bullying* policy.
- 1.2 The *Belonging and Behaviour Policy* operates in conjunction with the following policies:
 - *Anti-Bullying*
 - *Exclusion*
 - *Special Educational Needs and Disability (SEND)*
 - *Equality*
 - *Attendance*
 - *Safeguarding and Child Protection*
 - *Positive Behavioural Support Appendix*

2 Aims

- 2.1 As a Church of England school we are guided by the belief that God loves all people equally and desires each person to be able to grow, knowing that they are a child of God. At Holy Trinity we believe that high standards of behaviour lie at the heart of a successful school and enable children to feel they belong so that they make the best possible progress in all aspects of school life. We have high expectations of behaviour that support the development of our pupils as effective and responsible citizens.

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The Governors and staff at Holy Trinity believe that a safe, calm, orderly and positive environment in school has a huge impact on the behaviour and attitudes of pupils. A safe, calm, orderly and positive environment will enable pupils to learn and flourish and to live life in all its fullness (John 10:10)

Our relationships are underpinned by the Fruit of the Spirit – love, joy, peace, patience, kindness, goodness, faithfulness, gentleness and self-control (Galatians 5:22, 23). We recognise that sometimes relationships are not as we would want them to be. Forgiveness and reconciliation are key in repairing these relationships. Bear with each other, and forgive anyone who does you wrong, just as Christ has forgiven you. (Colossians 3:13) Matthew 7:12, *Treat others as you would want them to treat you*, forms the basis for our *Growing Together* rules.

- 2.2 The school has 4 simple *Growing Together* rules which each class discusses at the start of every academic year, and which are reinforced consistently throughout the school year, by all school staff:



- 2.3 The school expects every member of the school community to behave in a considerate way towards others.
- 2.4 The school treats children fairly and applies this *Belonging and Behaviour Policy* in a consistent way, but we are mindful of the specific needs of individual children, for example, those with Special Educational Needs or Disability, or those with attachment difficulties, which may require a different or specialist approach to behaviour. This approach is worked through on an individual basis, and communicated to all staff working with the particular child.
- 2.5 This policy aims to help children grow in a safe and secure environment, and to become positive, responsible and increasingly independent members of the school community. This policy aims to enable children to know that they belong to our school community. The school takes seriously any unexpected behaviour which is of a discriminatory nature.
- 2.6 The school rewards good behaviour, as it believes that this will develop an ethos of kindness and cooperation. This policy is designed to promote good behaviour, rather than merely deter poor/unexpected behaviour.
- 2.7 This policy relates to behaviour in class, at break and lunchtime, on school trips and before and after school when on school premises. Breakfast Club (run by an external company) and the After School Club, have their own behaviour policies which are in-line with this policy.

3 Expectations of Behaviour

At Holy Trinity we have high expectations for behaviour – behaviour for learning, and general behaviour. We believe that:

- Every child has the right to learn, but no child has the right to disrupt the learning of others
- Everyone has a right to be listened to, to be valued, to feel and be safe, regardless of the colour of their skin, how they look, their religion, their family background or for any other reason
- A positive approach to behaviour is vital
- Consistency in applying the policy is crucial
- All adults, both at school and at home, should be excellent role models for the children
- Every child has a personal responsibility for their own actions
- Effective communication with parents/carers, and support from parents/carers is key

4 Rewards

- 4.1 As a school we are keen to promote a non-shaming culture, and as a result we endeavour to *Praise in Public (PIP)* and *Remind in Private (RIP)*
- 4.2 We praise and reward children for good behaviour in a variety of ways:
- We deliberately praise or name good behaviour, or good manners in public throughout the school
 - Teachers congratulate children for their effort through a variety of different ways including verbal praise, written praise and stickers
 - Whole school focus weeks on a specific behaviour or Christian Value are held, and children are praised for showing this positive behaviour
 - Each week teachers nominate a child from their class who receives a celebration certificate;
 - Each term, teachers nominate 'Stars of the Term' for a number of different areas including writing, maths, French, sport, music and citizenship
 - Each term, teachers nominate children to receive the Inspire Award, and the Nicole Turner Mathematics Award
 - Each year, teachers nominate two children who receive the Headteacher's Award
 - House points are awarded to children, either for consistent good work or behaviour, or to acknowledge outstanding effort or acts of kindness in school. The winning house each term receives extra play time as a reward
 - All children in each class work towards receiving Golden Time as a class reward
 - Children have an opportunity to lead worship where they are able to reflect on our Christian ethos, worship, pray and show examples of their work
 - Displays around the school and in the class celebrate the children's work
 - Children are encouraged to show their work to other members of staff, including the Headteacher
- 4.3 The school acknowledges all the efforts and achievements of children, both in and out of school. We encourage the sharing of information regarding children's achievement out of school, e.g. music or swimming certificates. Children are encouraged to bring these achievements to our weekly celebration worship.

5 Consequences

At Holy Trinity we recognise that all behaviour is communication. We also recognise that the needs of pupils are all different. There are often reasons why a child is unable to learn effectively and may display behaviour that stops learning.

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If children are not following the *Growing Together* rules then the school employs a number of consequences to reinforce the *Growing Together* rules, and to ensure a safe and positive learning environment. Each consequence is used appropriately to each individual situation.

If a child is not following the *Growing Together Rules*, the following actions may be used:

- Using non-verbal and verbal cues to refocus a child
- Recognise, reinforce and reward positive learning behaviours
- Provide a change of activity or sensory break if this is required
- Recognise and validate a pupil's actions and feelings; ensuring that the child understands that their behaviour is stopping learning and encouraging them to take responsibility for their actions.
- Giving a Yellow card (these are not physical cards, but are noted down in the class online log), together with a natural consequence.

Examples of natural consequences

- If behaviour has disrupted their learning, the child may be asked to stay in at playtime to complete missed work
- If a child has been unkind to another child/adult, then they will spend some of their own time writing a letter of apology. Children will be supported to repair relationships.
- If a child has created a mess in the classroom, they will spend some of their own time tidying up the mess

If a child repeatedly does not follow the *Growing Together Rules*, or displays extremely poor/unexpected behaviour, then a Red card will be given, together with a natural consequence, and a period of reflection/repair. This is logged on our online behaviour log (frequently monitored by members of SLT), parents/carers are informed and a discussion with a member of SLT will take place to discuss the reasons behind the behaviour, and work out ways to support the child to display more positive behaviour.

All children aim for green and are following the *Growing Together* rules.

If a child is not following the *Growing Together* rules, they will be reminded of the expected behaviour and may be asked to move seats or take time out. If the behaviour continues then the child will be given a yellow card, and their behaviour recorded in the class online log. They will be given a natural consequence - usually some time off play time that day, during which, the child will be given an opportunity to reflect on their behaviour.

If the behaviour persists, or is of a serious nature, then a red card may be given. The child's behaviour will be recorded on the behaviour log, and parents will be informed. A natural consequence will be given on the day. This may include missing play time or lunchtime, reflecting on the behaviour, or writing a letter of apology. There will be a period of reflection with a member of SLT on, or as close to, the day that the unexpected behaviour has occurred.



On rare occasions, if the red card consequences are not having the desired impact, the child may be put on a Behaviour Report Card. This involves a meeting between school and home to agree short-term targets for the child to work on. The report card is sent home daily and a home-school communication book may also be introduced. In extreme cases the Headteacher may suspend a child for a fixed term, or exclude permanently.

6 Adjustments

Holy Trinity acknowledges the need to make reasonable adjustments for children with SEND in line with the Equality Act 2010. This will be personalised to include the needs of the child and may include personal behaviour strategies, rewards, visual timetables and learning breaks. Holy Trinity recognises that some children may need considerable adjustments to the *Belonging and Behaviour policy* and all staff need to be mindful of adapting to support such children to help them manage their own behaviour supportively.

7 Positive Behavioural Support

All members of staff are aware of the regulations regarding the use of force by teachers, as set out in Section 93, *Education and Inspections Act 2006* and the DfE guidance 'Use of Reasonable Force', July 2013. Merton's guidance on Positive behaviour (which includes positive handling of children) is adhered to (see Positive Behavioural Support Appendix).

Teachers in our school do not hit, push or slap children. Staff only intervene physically to restrain children or to prevent injury to a child, if a child is in danger of hurting themselves or others. The actions that we take are in line with government guidelines on the restraint of children.

Any use of physical restraint is recorded on MyConcern/Behaviour log as part of the log of this behaviour.

A number of members of staff have received CPI Safety Intervention Training, which focuses on prevention and de-escalation strategies, in addition to restrictive and non-restrictive interventions.

If physical restraint is needed on a regular basis, the school will seek the support of Merton's Virtual Behaviour Service.

8 Monitoring of Behaviour

All incidents of behaviour logged is monitored on a weekly basis. The Headteacher and Deputy Headteacher have an overview of behaviour in the school, and will address any concerns with class teachers, and parents/carers.

Behavioural incidents are reported each half term to the Governing Body.

Incidents of a racial, homophobic or transphobic nature are reported to Merton as required.

9 The role of the Headteacher

It is the role of the Headteacher to implement the school *Belonging and Behaviour Policy* consistently throughout the

school, and to report to Governors on the effectiveness of the policy. It is also the responsibility of the Headteacher to ensure the health, safety and welfare of all the children in the school.

The Headteacher supports the staff by implementing the policy, by setting the standards of behaviour, and by supporting staff in the implementation of the policy.

The Headteacher has access to records of all reported incidents of unexpected behaviour and monitors these regularly.

The Headteacher has the responsibility for giving suspensions to individual children for serious acts of unexpected behaviour. For repeated or very serious acts of unexpected behaviour, the Headteacher may permanently exclude a child. Both these actions are not taken lightly, and will only be used as a last resort if the school cannot keep the child, other children or staff safe.

10 The role of the Class Teacher and Support Staff

It is the responsibility of the class teacher to ensure that the *Growing Together* Rules are followed in their class, and that their class behaves in a responsible manner during lesson time, and around the school.

The staff in our school have high expectations of the children in terms of behaviour, and they strive to ensure that all children work to the best of their ability.

The staff treat each child fairly and enforce the behaviour expectations of the school consistently. The staff treat all children in their class with respect and understanding.

It is the responsibility of the class teacher to record significant incidents of unexpected behaviour on the Behaviour log.

It is the role of all adults in the school to model expected behaviour to children.

11 The role of Parents and Carers

11.1 Staff welcome early contact if parents/carers have a concern about their child's behaviour or fear that they are being upset by others. If parents/carers and school work together, we believe that the discipline and behaviour of pupils will be maintained by all.

11.2 Parents/carers can help in the following ways:

- By ensuring children understand the *Growing Together* rules and do their best to follow them
- By ensuring regular attendance at school and avoiding unnecessary pupil absence
- By ensuring that pupils arrive punctually for the start of the school day
- By managing children's behaviour on school premises before and after school
- By ensuring the children understand their responsibility to have the correct equipment in school and to hand in any homework on time
- By ensuring that pupils have appropriate dress for school and PE so as to take a full part in all school activities

- By supporting the school in our policy that all pupils are expected to behave in a responsible manner, both towards themselves and others, showing consideration, courtesy and respect for other people at all times
- By ensuring that pupils show a proper regard for other people's property, buildings and the environment
- By modelling excellent behaviour in the playground

12 The role of the Children:

Children should follow the *Growing Together* rules at all times, and treat others how they would like to be treated.

13 The role of Governors

The Governing Body must ensure that policies designed to promote good behaviour and discipline on the part of its pupils are pursued at the school. It is recommended that the policy is reviewed annually by the Governing Body.

14 Suspensions and permanent exclusions (see separate Exclusion Policy)

- 14.1 We do not wish to suspend/exclude any child from school, but under exceptional circumstances this may be necessary. The school has therefore adopted the standard national list of reasons for exclusion, and the DfE guidance, *Exclusion from maintained schools, Academies and pupil referral units in England*. We refer to this guidance in any decision to suspend/exclude a child from school.
- 14.2 Only the headteacher (or the acting headteacher) has the power to suspend/exclude a child from school. The headteacher may suspend/exclude a child for one or more fixed periods, for up to 45 days in any one school year. In extreme and exceptional circumstances, the headteacher may exclude a child permanently. It is also possible for the headteacher to convert a suspension into a permanent exclusion, if the circumstances warrant this.
- 14.3 If the headteacher suspends/excludes a child, s/he informs the parent/carers as soon as possible, giving reasons for the suspension/exclusion. At the same time, the headteacher makes it clear to the parent/carers that they can, if they wish, appeal against the decision to the governing body. The school informs the parent/carers how to make any such appeal.
- 14.4 The headteacher informs the Local Authority and the governing body about any permanent exclusion, and about any suspensions beyond five school days in any one term or where the child would lose an opportunity to take a national curriculum test or public examination.
- 14.5 The governing body itself cannot either suspend/exclude a child or extend the exclusion period made by the headteacher.
- 14.6 When an appeals panel meets to consider a suspension/exclusion, they consider the circumstances under which the child was suspended/excluded, consider any representation by parent/carers and the LA, and consider whether the child should be reinstated.

14.7 If the governors' appeals panel decides that a child should be reinstated, the headteacher must comply with this ruling.

Positive Behavioural Support Appendix

Aim

In our school keeping pupils safe is of paramount importance. We recognise that positive relationships between staff and pupils is the key to promoting good behaviour and to avoid challenging behaviour. However, in an inclusive school there may be occasions when behaviour poses a risk to pupils or others. This appendix outlines how we support staff to manage incidents and how we promote positive relationships at school between staff and pupils.

As a school we are committed to

- Ensuring that all staff have a common understanding of behaviour as a form of communication and are supported to make sense of difficult or distressing behaviour
- Ensuring all staff understand the importance and significance of touch in a school environment
- Providing appropriate training to develop staff skills in de-escalation
- Making sure that staff have a shared understanding of risk and know how to reduce risk in a school environment
- Ensuring all staff are aware of their legal duties and the legal framework underpinning the management of challenging behaviour.
- Supporting staff to manage their own emotions when managing challenging behaviour and providing support where required after an incident.
- Supporting children and young people to manage their own behaviour.

I. Building Relationships and a Whole School Approach

We recognise that fostering good relationships amongst pupils, staff, parents and the local community is the key to positive behavioural support. As a school we are committed to developing a whole school approach (see above policy). This is built on mutual respect, trust and commitment to listening to, and involving pupils, parents and staff in developing our policies and practices.

We aim to be fair and consistent in how we support positive behaviour, providing clear rules, rewards and consequences that are shared with the whole school community. These are reviewed on a regular basis to ensure their effectiveness. We understand the importance of creating a positive environment where adults model positive attitudes and interactions to all members of the school community, and where all pupils feel safe and welcome.

Evidence shows clear links between good behaviour and effective teaching and learning. 'Quality First Teaching'¹ is our initial response to meet the additional needs of pupils. This includes appropriate training for our staff regarding the specific needs of our pupils, e.g. autism, speech and language needs, ADHD and attachment issues.

We recognise that whilst all pupils will benefit from a clear structure for behaviour, some pupils will require a more personalised approach. We will make all reasonable adjustments to support pupils' additional needs to reduce the likelihood of high-risk behaviours. We also provide a range of interventions to meet the social and emotional needs of our pupils, these include *Lego therapy*, *ELSA*, *pastoral support*, *a key adult*, *Nurture* (more information about our interventions and support can be found in our *SEND information report*).

¹ "quality first teaching" refers to high quality teaching including a broad range of teaching strategies, which are adapted to meet the needs of pupils, and relevant assessment to inform teaching and learning and the early identification of under achievement.

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Our school works in close partnership with other agencies and families to ensure that we provide timely and effective support. Parents and carers are involved when creating and reviewing SEND support plans and risk assessments. We provide a graduated response to a range of needs and we involve external agencies as appropriate.

2. Behaviour as communication

“Behaviour is a means of communication and all behaviour has a purpose. Behaviour that challenges may signal a need for support. Behaviour policies and practice should recognise this and support children and young people to develop alternative ways of expressing themselves that achieve the same purpose but in more appropriate ways.”

Reducing the Need for Restraint and Restrictive Intervention HM Gov 27 June 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812435/reducing-the-need-for-restraint-and-restrictive-intervention.pdf

In recognition of this, when behaviour is concerning we seek to analyse and identify triggers and the underlying needs. We believe that all staff have a responsibility to manage their own emotional responses to behaviour in recognition that their behaviour influences the behaviour of those around them including pupils. As a staff group we endeavour to be reflective practitioners.

3. Touch and Relationships

“The department believes that the adoption of a ‘no contact’ policy at a school or college can leave staff unable to fully support and protect their pupils and students. It encourages headteachers, principals, governing bodies and proprietors to adopt sensible policies, which allow and support their staff to make appropriate physical contact.” (DfE: Keeping Children Safe in Education KCSIE)

Touch occurs in many aspects of school life for example during music or PE lessons, when giving first aid, or during a fine motor skills activity. We recognise that appropriate touch is an important aspect of healthy relationships. Children learn who they are and how the world is by forming relationships with people and things around them. The quality of a child’s relationship with significant adults is vital to their healthy development including their emotional health and wellbeing.

Some of our pupils who require emotional support at school may have experienced trauma or distress and some may not have had a positive start in life.

It is with this in mind that our staff seek to respond to pupils’ developmental needs by using appropriate safe touch. Research has shown the importance of safe touch as a positive contribution to brain development, mental health and the development of social skills.

Children need affection to remind them that someone cares. Our staff will only make physical contact with children in order to meet their physical, developmental, emotional or safety needs. When a child needs affection, reassurance or comfort, it is appropriate to respond in a manner suitable for that child developmental stage and needs. Staff must ensure that their actions do not make them vulnerable to misinterpretation and must always be aware of gender, cultural and individual factors that may play a part when considering appropriate touch. Always consider the best interest of the child.

4. Safety and Risk Reduction

“Behaviours that challenge are often foreseeable, though it may be difficult to predict exactly when they will occur or the degree of challenge they will pose. Settings and services can seek to improve foresight by:

- *Exploring why children or young people behave in ways that pose a risk*
- *Trying to understand the factors that underlie or influence the behaviour*
- *Recognising the early warning signs which indicate that the behaviour is beginning to emerge*

• *Developing the skills to manage difficult situations competently and sensitively.*”

Reducing the Need for Restraint and Restrictive Intervention HM Gov 27 June 2019

As a school, we are committed to taking all reasonable steps to minimise behaviour that is a risk to pupils or to other members of the school community.

Our approach to planning support for our vulnerable pupils always seeks to be person centred and to capture the voice of the child and family where at all possible. Our graduated approach to pupils with SEND follows an ‘assess, plan, do, review’ process and ensures that we take an increasingly personalised and multi-agency approach to pupils with the highest level of needs.

As an inclusive school, we recognise that pupils with a variety of needs will require us to make reasonable adjustments to our environment in order to reduce levels of stress and anxiety. In addition, we aim to identify children’s individual triggers, to pre-empt difficulties where possible and to provide opportunities to calm if they are needed. We always follow up any high-risk incidents with pupils and with staff and take steps to reduce the likelihood of the situation happening again.

We provide support to pupils to teach coping strategies through our whole school Personal Social and Health Education programme, through our targeted small group work and through our Emotional Literacy Support Assistant (ELSA) 1-1 sessions. If a pupil’s behaviour presents a risk to themselves or to others, in the first instance we write a risk assessment to identify and put in place additional measures to lower the risk for all concerned. These are developed in dialogue with pupils and families. For pupils with the highest levels of need this is a multi-agency plan which includes a behaviour support plan. These are regularly reviewed by relevant staff to ensure that they remain effective. “We start from the premise that staff should work positively and confidently with children and find the least intrusive way possible to support, empower and keep children safe” OFSTED – Positive Environments Where Children Can Flourish 2021

<https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish/positive-environments-where-children-can-flourish>

5. The Use of Physical Intervention

“Schools should **not** have a ‘no contact’ policy. There is a real risk that such a policy might place a member of staff in breach of their duty of care towards a pupil, or prevent them taking action needed to prevent a pupil causing harm.”

DfE Use of Reasonable Force in Schools 2013

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

The DfE guidance on the use of force 2013 outlines the situations when force can legally be used in schools. Our approach is to focus on risk reduction to minimise the likelihood of restrictive physical interventions needing to be used in our school setting. Most behaviour can be anticipated and planned for.

“Any use of restraint carries risks. Risks may be to the child or young person whose behaviour challenges, other children and young people, staff, other adults or property. They may arise as a result of interactions between the child or young person and their environment, the direct impact of the child or young person’s challenging behaviour, or measures and interventions used to limit or manage risks to the child and/or others.

Those risks need to be balanced against the risks associated with other courses of action, including the risks of taking no action at all. Risks associated with applying restraint or deciding not to do so include causing physical injury, causing a flight response, psychological trauma, distress and emotional disturbance to the child or young person and to staff.”

Reducing the Need for Restraint and Restrictive Intervention HM Gov 27 June 2019

We recognise as a school that there may be unexpected, exceptional circumstances where we might need to intervene physically to keep a pupil (or pupils or staff) safe. This would always be a last resort and only where there is an imminent threat of danger to the child, other children or member of the school community. If a situation arose where the use of restrictive physical intervention was required, it would always be the least amount, for the least amount of time to keep the child or wider school community safe. Any use of restrictive physical interventions would need to be in the best interest of the child and be reasonable and proportionate in order to be lawful.

If the need ever arises to use a restrictive physical intervention we will always record the incident and contact parents/ carers as soon as possible to discuss. This would be followed by an immediate a review of the incident, the lead up to it, the incident itself, how it was responded to and the outcomes. This may include consultation with other agencies and will help to reduce the likelihood of the situation reoccurring.

Through our risk reduction approach, we aim to ensure that any incident where a restrictive physical intervention is required is very rare. We are also mindful of the impact of any type of restrictive physical intervention on children with SEND.

6. Recording of Incidents and Monitoring

In line with our *Belonging and Behaviour Policy* we record incidents (on MyConcern or the online behaviour log) of risky behaviours including incidents that may result in the use of a restrictive physical intervention. In addition, we record any injuries to staff. We do not use photos or filming of children as part of our recording of incidents.

We review our incident data on a regular basis which allows us to identify pupils who may need additional support and referral to appropriate outside agencies. We also report to governors about behaviour on a half-termly basis. As a school we are committed to analysing our behaviour data to support us to identify where we may need to make changes.

Under the United Nation's Convention on the Rights of the Child (UNCRC), children have the right to express their views on all matters affecting them, and in relation to how behaviour is managed in schools this should always be with due respect for their human rights (article 28)

Pupil's involvement therefore, should include full participation in the planning and review of environmental changes that can reduce the possibility of behaviours.

7. Concerns and complaints

If parents have concerns about how a matter has been dealt with, they should follow school procedures and communicate the concern with a member of the senior leadership team.

If there is a complaint, this should be processed through the school's complaints procedure. This document is readily available on the school website.

Safeguarding concerns should be reported directly to the school's DSL (Designated Safeguarding Lead).

Parents also have the right and may feel that it is more appropriate or necessary to contact the Local Authority Designated Officer (LADO) - See the Merton Children's Safeguarding Partnership's website for contact details and procedures. In most instances however, the school should be the first port of call to report a concern.

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As well as the duty of care to children's welfare, the school has a duty of care for staff too. Where a concern/allegation is raised about a staff member, it should be dealt with in a serious yet sensitive, confidential manner, with appropriate regard for staff welfare.

If a staff member has a concern about how another staff member has dealt with an incident, in the first instance – this should be reported to senior leadership (the head where possible). All staff have a responsibility to report where necessary. If, in the unlikely event the school does not appear to investigate /take appropriate action, the staff member also has the right to report the concern to the Merton LADO.