

Low-Level Concerns Policy (Safeguarding Policy amendment)

This section is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education.

This applies to all concerns (including allegations) about members of staff, including volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

Suspicion

Complaint

Disclosure made by a child, parent or other adult within or outside the school

Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns

The term 'Low-Level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door Using inappropriate sexualised, intimidating or offensive language

Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

Have clear policies and procedures

Empowering staff to share any low-level concerns as per section 7.7 of this policy

Empowering staff to self-refer

Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Helping to identify any weakness in the school's safeguarding system

Reporting a low-level concern

- A) Low level concerns about a member of staff should be reported to the Managing Director as per the company's Child Protection procedures via SENAP.
- B) If the concern is about the Director's this should be reported to LADO
- C) Low level concerns about Volunteers, contractors and local authority visiting staff will also be reported to their employers.
- D) Staff should use the company's Reporting Form on the system.

Responding to low-level concerns

If the concern is raised via a third party, managing director will collect evidence where necessary by speaking:

Directly to the person who raised the concern, unless it has been raised anonymously

To the individual involved and any witnesses

The managing director will use the information collected to categorise the type of behaviour and determine any further action, in line with the alternative provision's staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the alternative provision feel may need further guidance on will be referred to the LADO for advice.

- Low level concerns that the alternative provision feel they can deal with internally will be dealt with via the alternative provision's usual child protection investigation process.
- The alternative provision will engage with its HR adviser where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record keeping

All low-level concerns will be recorded on our system. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a volunteer or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a low-level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Managing Director will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates volunteers, or any other concerns arise, Project One can contact the LADO for further advice.

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.