



Growing, Learning, Achieving Together

## Low-Level Concerns Policy

	Date	Signature
Discussed at Staff meeting	6.3.23	
Discussed at FPP		
FGB:		

Responsibility of Finance, Personnel and Policy Committee

Next Review Date: \_\_\_\_\_

### **Vision Statement**

The School's Christian Vision Statement "Let your light shine" is our central vision. Everyone is encouraged to shine through living out our values of trust, honesty, thankfulness, respect and resilience. Enabling us to grow, learn and achieve together.

#### **Growing, Learning, Achieving Together**

**Growing** in confidence, personal awareness and ability

**Learning** in creative, fun, technologically assisted and investigative ways

**Achieving** as individuals, teams and as a whole school community across a diverse range of opportunities

**Together** through our shared values of trust, honesty, thankfulness, respect and resilience.

## **1. Introduction**

At Cold Harbour, we take safeguarding very seriously. This includes ensuring that staff and volunteers are aware of concerns that impact on children.

## **2. Summary**

It may be possible that a member of staff acts in a way that does not cause risk to children but is inappropriate. A member of staff who has a concern about another member of staff (or is informed by a pupil, parent, other staff member or another agency) should inform the Head Teacher about their concern using a Low-Level Record of Concern form. If the Head Teacher cannot be contacted, the Assistant Head Teacher should be informed. If the concern is about the Headteacher, the Chair of Governors must be informed.

A low-level concern form should also be completed in all cases.

The form will be available on the school system or directly from:

- The Head Teacher
- Assistant Head Teacher

It can also be requested via email from the above people

## **3. Low level Concerns**

A low level concern is not insignificant, but is one that does not meet the threshold for harm and a referral through to the LADO

It includes behaviour such as

- Being overfamiliar with children
- Having favourites
- Shouting at a child
- Acting inconsistently with the school code of conduct
- 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
- Inappropriate behaviour out of work such as use of drugs, inebriation or acting in a way that brings disrepute on the school or teaching profession.
- Referring to the school , school pupils and parents and school business on social media.

These concerns would commonly not have any direct harm to children but may be the result of carelessness or thoughtlessness.

Staff are encouraged to self refer, if they breach the low level policy. Staff who do not self disclose may be subject to disciplinary action.

## **4. Investigation of low-level concerns**

The Head Teacher or Assistant Head Teacher (or Chair of Governors) will follow up on all low-level investigations. They should talk to the person reporting the concern (unless this is anonymous) and follow up with the person who the concern is raised about and any witnesses.

The Head Teacher will consider the full details of concerns, if they are unsure if the allegation meets the harm criteria or not then they will consult the LADO for advice and guidance.

If the concern is deemed low level, they will gather information and take any appropriate action, this may involve a disciplinary, retraining or rewriting of policies.

The record will be kept on the person's personnel file. In the event of other allegations being made which meet the Harm criteria for a referral to the LADO, the Head Teacher will share this information fully with the LADO as this will identify any patterns or escalation in behaviour.

## **5. Clarity around Allegation vs Low-Level Concerns vs Appropriate Conduct**

Keeping children safe in education 2022 gives clear guidance around these concerns

### **Allegation**

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

### **Low-Level Concern**

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Reference: *Developing and implementing a low-level concerns policy: a guide for organisations which work with children* Safeguarding Unit, Farrer & Co (Adele Eastman, Owen O'Rorke, Katie Fudakowski and David Smellie), Marcus Erooga, and Delyth Lynch

## **6. Storage and use of Low-Level Concerns and follow-up information**

Low-Level Concern forms (Appendix 2 )and follow up information will be stored securely within the schools safeguarding systems on an individual's personnel file, with access only by the core management team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or in their absence the Assistant Head Teacher.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

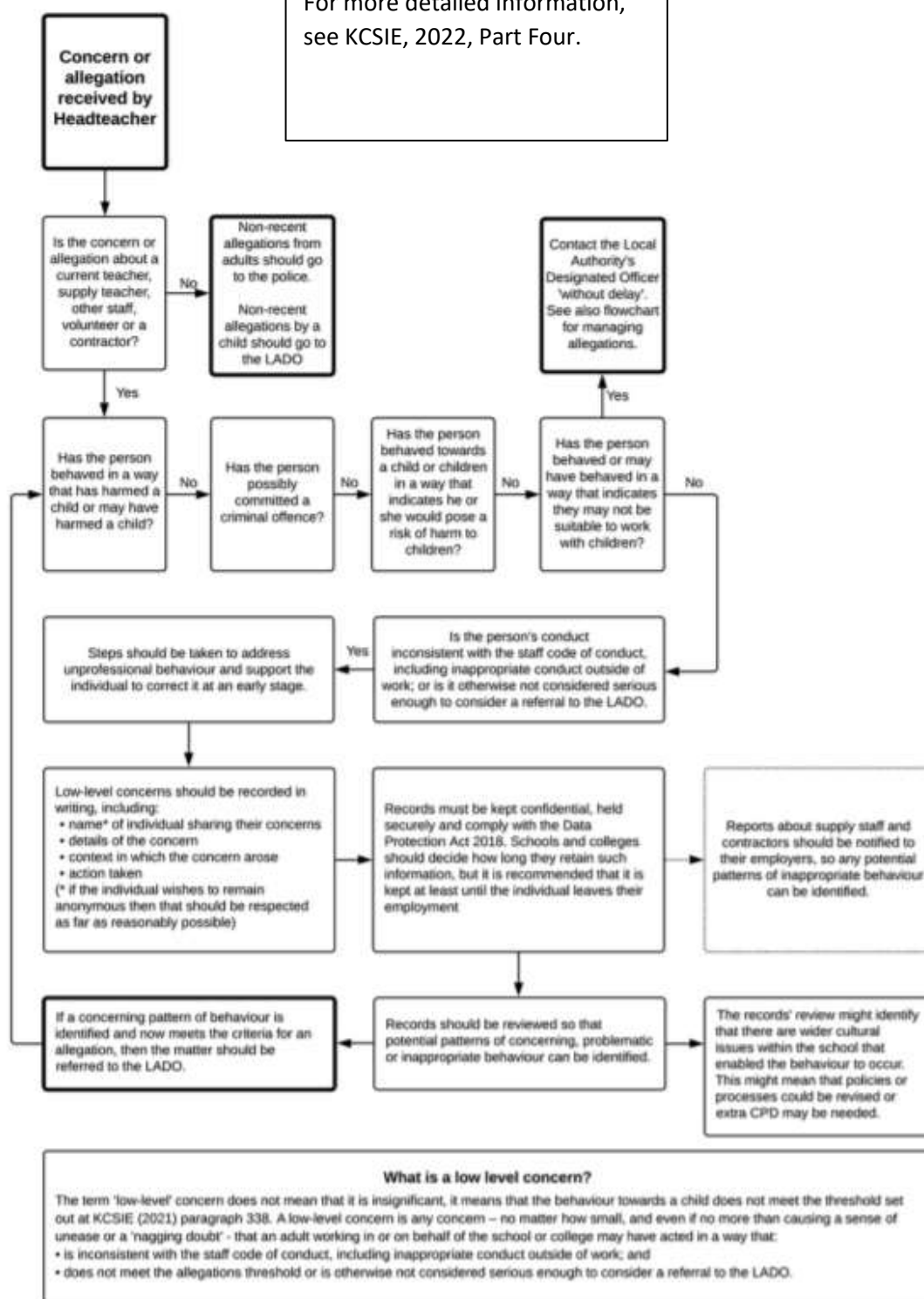
Whenever staff leave Cold Harbour, any record of low-level concerns, which are stored about them, will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

- a) Whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or,
- b) If, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

## Appendix 1

For more detailed information, see KCSIE, 2022, Part Four.



## Appendix 2

### Low-Level Concern Form

<u>Low-Level Record of Concern Regarding A Staff Member</u>	
<p>Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:</p> <ul style="list-style-type: none"> <li>• Is not consistent with our Code of conduct, and/or;</li> <li>• Relates to their conduct outside of work, which, even if not linked to a particular act or omission, has caused a sense of unease about an adult’s suitability to work with children.</li> </ul> <p>Where possible please speak with the Head Teacher or Assistant Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head Teacher. When completed, please pass this form to the Head Teacher. If the concern is about the Head Teacher, please pass on to the Chair of governors. <b>Remember a low-level concern is different to an allegation.</b></p>	
Date of low-level concern:	
Member of staff involved:	
Concern information:	
Reported by:	
Discussion with LADO: Date and details of discussion	
Outcome:	
Disciplinary Action required	
Training Required	
Change in Policy	
Escalated to LADO	