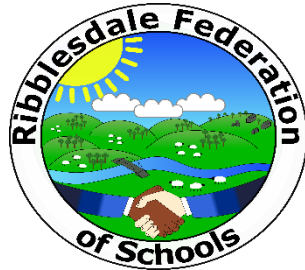


The Ribblesdale Federation of Schools

Do Everything in Love (1 Corinthians 16:14)



Low Level Concerns Policy

Document Status			
Date of policy creation/review	Reasons for review	Date of adoption by the Governing Board	Date of next review
Signed and dated: 27.11.23			
Executive Headteacher	<i>C. Maddock</i>	Chair of Governors	<i>John Buckley</i>

Low Level Concerns Policy

This policy applies to all adults, including volunteers, working in or on behalf of the school. It will provide a framework for staff to meet their statutory duties and to ensure consistency of good practice.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centered. This means that they should consider, at all times, what is in the **best interests** of the child. *Keeping Children Safe in Education (KCSIE) DfE 2023.*

The Ribblesdale Federation has procedures in place to manage **any** safeguarding concerns (no matter how small), and allegations that **do not** meet the harm threshold against staff (including supply staff and volunteers and contractors). These are known as **Low Level Concerns** which will be addressed as set out in Section two of Part Four of KCSIE 2023 and in line with NYSCP procedures.

As part of their whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We understand that it is critical to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. If implemented correctly, this should:

- enable school to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- 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 and Federation.

This policy applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold. These concerns are classed as low-level concerns.

Concerns may arise through, for example:

- Suspicion;
- Complaint;
- Safeguarding concern or allegation from another member of staff;
- 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.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is 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 staff code of conduct, including inappropriate conduct outside of work, and;
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their 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, or;
- Humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example:

- suspicion;
- complaint;
- or disclosure made by a child, parent or other adult within or outside of the organisation;
- or as a result of vetting checks undertaken.

We understand that it is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of school from becoming the subject of potential false low-level concerns or misunderstandings.

The Governing Board of the Ribblesdale Federation of Schools has adopted and agreed a staff Code of Conduct and Safeguarding/Child Protection policy. Our low-level concerns policy indicates what a low-level concern potentially is and provides specific examples.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially 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;
- Empowering staff to share any low-level concerns;
- 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.

All low-level concerns will be treated confidentially and should be recorded on the Low Level Concern Form template pro-forma (Appendix I). All concerns should initially be shared with the Executive Headteacher, if the concern is in relation to a member of staff. If the concern is about the Executive Headteacher, the concern should be shared with the Chair of the Governing Board.

The Executive Headteacher will be the ultimate decision maker in respect of all low-level concerns but may take a collaborative approach by consulting with a DDSL.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If the Executive Headteacher is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with their LADO, as will the Chair of the Governing Board. If the concern is in relation to the Executive Headteacher, they may also discuss concerns confidentially with their HR officer and School Adviser.

The Ribblesdale Federation of Schools will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Responding to low-level concerns

If the concern is raised via a third party, the Executive Headteacher 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 Executive Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct. The Executive Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Recording low-level concerns

All low-level concerns should be recorded in writing on the Low Level Concern Form reporting template. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records of low-level concerns will be kept confidentially, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Records will be retained until the individual leaves employment at the school.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

Professional 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

References

Reference to policies and guidance in this policy include:

- Keeping Children Safe in Education;
- The Ribblesdale Federation Staff Code of Conduct;
- The Ribblesdale Federation Child Protection and Safeguarding Policy;
- Disciplinary Policy and Procedure.



Appendix I

Low Level Concern Form
The Ribblesdale Federation of Schools

This form can be used to share any concern with the Designated Senior Manager/Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that is inconsistent with the Schools’ Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, ‘harm’ threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

Details of CONCERN :

<p>Name of Staff member :</p> <p>Signed :</p>	<p>Department and Role :</p> <p>Time and Date :</p>
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Received by :

At [time] : **Date :**

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO - Give a brief but valid reason/explanation for not;

YES - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : No :

Signed :

Dated :

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.