Low-Level Concerns Policy

This policy 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 supply teachers, volunteers and contractors, which do not meet the harm threshold.

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' 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 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
- Humiliating, belittling or ridiculing children

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 described in KCSIE and child protection policy.
- Staff are encouraged to self-report where they believe they may have acted in a manner that could be misinterpreted, falls below professional standards, or could constitute a low-level concern.

- 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
Low-Level concerns about a member of staff should be reported to the Headteacher as per the school's Child Protection procedures.

Low-level concerns may be raised verbally; however, all concerns must be recorded in writing on CPOMS to ensure an accurate record is maintained.

Any low-level concern relating to the conduct, behaviour or professional boundaries of an adult working in or on behalf of the school must be reported without delay and recorded using the 'StaffSafe' section within CPOMS. Staff should complete the 'Add Staff Concern' form as soon as possible after the concern arises. All concerns submitted through this process will be reviewed by the Headteacher and managed in accordance with the school's safeguarding procedures. Records will include details of the concern, the context in which it arose, any actions taken and the rationale for decisions made. A copy of the 'Add Staff Concern' form can be found in Appendix 1.

If the concern is about the Headteacher this should be reported to the Chair of Governors, Mrs Katie Andrews. g41kandrews@mill-lodge.solihull.sch.uk

Low-Level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Responding to low-level concerns
If the concern is raised via a third party, the 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

Anonymous low-level concerns will be considered and assessed on their merits. Whilst anonymous reports may be more difficult to investigate, they will be reviewed carefully, and any appropriate action will be taken based on the information available.

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

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low-Level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low-Level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.

- The school will engage with its HR provider 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 'StaffSafe' within CPOMS. 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, 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 supply teacher 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 Headteacher 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 to a volunteer, or if any other concerns arise, the school may seek advice from the LADO.

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.

Appendix 1: Copy of Staff Concern form on CPOMS

