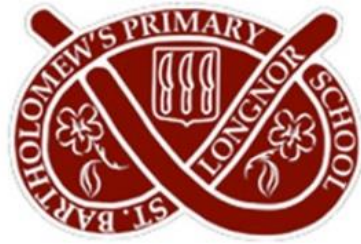


Low-Level Concerns Policy

St Bartholomew's CE Primary School



Version: V1.0

Prepared by: LB

Valid from date: September 2024

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Approved by: FGB

Policy Updates	
Version Number	Changes
1.0	New Policy

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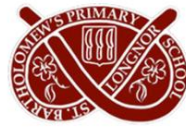
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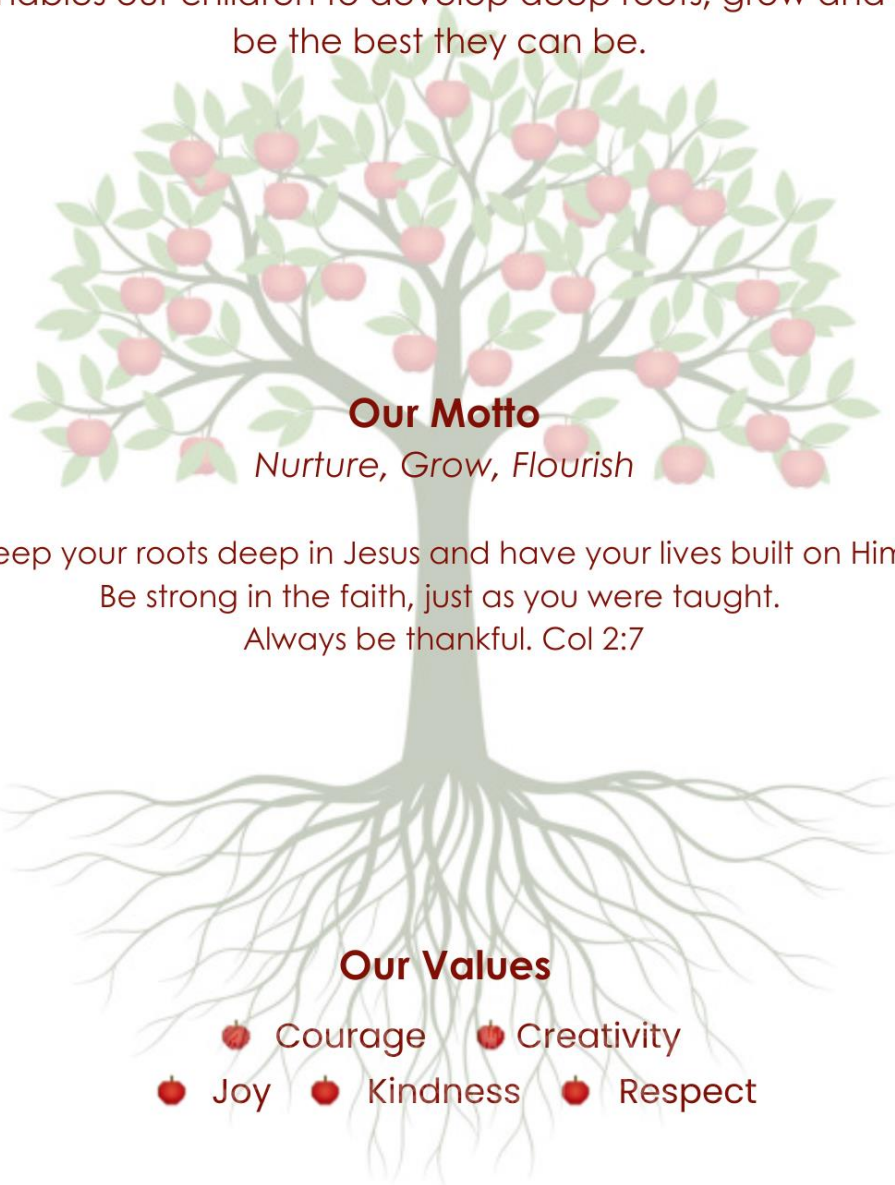
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St Bartholomew's Vision

To be a loving and nurturing Christian school community, providing the rich soil that enables our children to develop deep roots, grow and flourish, to be the best they can be.



Our Motto

Nurture, Grow, Flourish

Keep your roots deep in Jesus and have your lives built on Him.
Be strong in the faith, just as you were taught.
Always be thankful. Col 2:7

Our Values

- Courage
- Creativity
- Joy
- Kindness
- Respect

Purpose

This policy sets out a framework whereby staff are expected to report concerns about their own behaviour, or that of another member of staff, trainee teacher, college/work placement student, volunteer, supply teacher, Trustee, contractor or other person working in school (all references to 'adult' could include any members of this group). Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour.

The policy aims to create a culture in which all concerns about adults which are made in good faith are shared responsibly with the right person and are recorded and dealt with appropriately and sensitively. This policy intends to identify inappropriate, problematic, or concerning behaviour at an early stage; minimise the risk of abuse; and ensure that all adults are clear about professional boundaries and act with these boundaries and in accordance with the values and ethos of the Trust.

The policy should be read in conjunction with the school's Safeguarding Policy, Staff Code of Conduct, Governor Code of Conduct, and current statutory guidance, 'Keeping Children Safe in Education' (part 4).

An intention of this policy is to maintain a school culture whereby adults are clear about expected behaviours and feel confident to report any behaviour which may be construed as falling short of the standards set out in St Bartholomew's Staff Code of Conduct. The policy provides for responsive, sensitive and proportionate handling of such concerns when raised – maintaining on one hand the confidence that concerns will be handled promptly; and on the other hand that staff will be protected from false or malicious allegations or misunderstandings. Staff making a referral must maintain professionalism and sensitivity to the situation at all times.

Those raising concerns or reporting allegations in good faith will be supported and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern of allegation is found to be substantiated.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff and/or Governors Codes of Conduct; and
- Does not meet the allegation threshold of harm, or is otherwise not serious enough to consider referral to the Local Authority Designated Officer (LADO).

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- Being over-friendly with children;
- Having favourites;
- Taking photographs of children on a personal mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area; or
- Using inappropriately sexualised or offensive language.

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 e.g. suspicion; complaint; disclosure made by a child/parent/carer or other adult; or as a result of vetting checks undertaken.

It is essential that low-level concerns are shared responsibly and in good faith with the right person and recorded and managed appropriately. Ensuring that they are dealt with effectively should also protect those working in, or on behalf of schools from becoming the subject of potential false low-level concerns or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported to the headteacher as soon as possible.

Where the headteacher (DSL) is not available, then will be reported to Deputy Designated Safeguarding Lead (DDSL). They must then pass this information to the headteacher.

Low-level concerns regarding the DDSL will be reported to the headteacher. Concerns about the headteacher will be reported to the Chair of Governors.

Low-level concerns regarding supply staff, or contractors (including kitchen staff, cleaners not employed by the school, or school PE or after-school club providers) should be notified, via the headteacher, to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

A summary of the low-level concern should be written, signed, timed, dated and shared with the relevant person (see previous section) by the person raising this in good faith. A copy of the recording sheet can be found in Appendix 1.

These documents will be kept securely and any digital copies password-protected (password to be established by the Executive Principal). Documents must be treated and named as confidential, and any hard copies are to be stored in a lockable filing-cabinet within a folder marked 'LLC Confidential'.

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

Self-referral of low-level concerns

If adults have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or upon reflection they believe they have behaved in such a way that they consider falls below the expected professional standards, they would be encouraged to self-refer.

Responding to low-level concerns

Where a low-level concern has been raised it should be dealt with promptly. The headteacher will:

- Review the written concern seeking clarification from the referrer if necessary;
- Speak to the individual about the concern raised to ascertain their response or perspective (in the event of self-referral);

- Where a pattern of such behaviour is identified, or the concern could be deemed to be meeting the harm threshold, it may be referred to the LADO;

As part of the review, the headteacher, will determine the next steps and whether:

- It constitutes a low-level concern and as such, no further action is needed or additional support/ resources/ CPD may be beneficial (discussions should take place with the employee to identify how this can be avoided and potential next steps should this be repeated); or
- It is serious enough to refer to the LADO.

In both cases: all discussions and the decision and rationale should be documented.

If the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

References

St. Bartholomew's C.E. Primary School will, in accordance with 'Keeping Children Safe in Education', "...only provide substantiated safeguarding concerns/ allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references." Low-level concerns will not be included in references unless they relate directly to issues which would usually be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Appendix 1 – Low-Level Concerns Reporting Form

Referrer			
Name:		Date & time completing form	
Details of adult being referred			
Name:		Role:	
Name of employer:			
Low-level concern			
Date and time of concern:		Location of concern:	
Parties involved:			
Details of concern <i>(consider the behaviour, what exactly happened, why it worries you, why you believe it breaches the Code of Conduct):</i>			
Details of any children involved:			
Any other information relevant:			
Signed:			