



St. Gregory's Catholic High School

Low Level Concerns Policy

Monitoring

The implementation of the policy will be monitored by the Deputy Headteacher, Pastoral

Evaluation

The policy was reviewed by the Deputy Headteacher (Pastoral) and the Senior Leadership Team on 12th September 2022 prior to submission of the policy to Governors' Community Committee for scrutiny and recommendation to the Full Governing Board for approval

Policy Review Dates:

Date last approved by Full Governing Board: New

Date submitted to governor committee: 20th October 2022

Date submitted to Full Governing Board: 7th December 2022

Review Frequency: Annual

Start date for policy review: June 2023

Concerns that do not meet the harm threshold

The policy is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This policy applies to all low-level concerns about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

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.

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 own mobile phone
- . Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- . Humiliating pupils

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

Sharing Low Level Concerns

It is critical that all low-level concerns are ultimately received by the Headteacher. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost. It is important that low-level concerns are shared with the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) - although it should also be emphasised that it is never too late to share a low-level concern and a delay should never be seen as a barrier to sharing. If the Headteacher is absent for any reason, low-level concerns should be shared with the DSL who should ensure that they inform the Headteacher immediately on their return. If any low-level concern relates to the behaviour of the Headteacher it should be dealt with in accordance with paragraph 74 of KCSIE.

Anonymity

If the staff member who raises the concern does not wish to be named, then St Gregory's will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity will never be promised to members of staff who share low-level concerns.

Where possible, St Gregory's will try to encourage staff to consent to be named, as this will help to create a culture of openness and transparency.

Self-Reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

In line with KCSIE St Gregory's will ensure that there is an environment where staff are encouraged and feel confident to self-refer.

Sharing and Recording of Low-Level Concerns

Staff will be given the option of sharing their low-level concern verbally with the Headteacher in the first instance, or by completing a simple low level concerns form, an example of which can be found in Appendix 2. Where the low-level concern is provided verbally, the Headteacher will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. Sound professional judgement will be exercised by the Headteacher in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern and their role should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this will be

fairly recorded alongside the concern. The record will include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record must be signed, timed and dated.

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

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. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they will collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. 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 appendix 1 of this policy, 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.

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

Low level concerns that are deemed to meet the harms threshold, include where anyone working in the school, including supply teachers, volunteers and contractors has:

- o Behaved in a way that has harmed a child, or may have harmed a child, and/or
- o Possibly committed a criminal offence against or related to a child, and/or
- o Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- o Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation in line with our 'Allegations Against Staff Policy'.

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

Name of Staff Member

Nature of concern:

Signed

Name

Date & Time

Received by

Date & Time

Action Taken:

Signed.....

Date.....