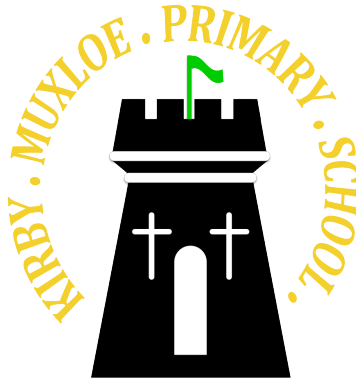


Kirby Muxloe Primary School



Low Level Concerns Policy

Status: Statutory

Date adopted by governing body: October 2023

Date for review: Autumn 2024

At Kirby Muxloe Primary School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Handbook. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

Summary

It may be possible that a member of staff acts in a way that doesn't cause risk to the pupils, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern. If the Head Teacher cannot be contacted, the information will be shared with the Designated Safeguarding Lead or Deputy.

Keeping Children Safe in Education (September 2023)

The following is taken from KCSIE

As part of their whole school approach to safeguarding, schools, and colleges should ensure that they 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.

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

- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse
- 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 institution

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is an 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 Handbook, including inappropriate conduct outside of work
- does not meet the harmful threshold or is otherwise not serious enough to consider referral to the LADO

Examples of such behaviour could include but not limited to:

- being over friendly with pupils
- 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 pupils

Such behaviour can exist on a wide spectrum, from 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 suspicious, complaint, or disclosure made by a child, parent or other adult within or outside of the school, or as a result of vetting checks undertaken.

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 the schools becoming the subject of potential false low-level concerns or misunderstandings.

Clarity around allegation vs Low-Level Concern v Appropriate Conduct

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.

Reporting Low Level Concerns

Where a Low-Level concern has been identified this will be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened.

Where the Headteacher is not available, the information will be reported to the Designated Safeguarding Lead (DSL) or Deputy (i.e the most senior member of SLT acting in this role)

Low-Level concerns about the DSL will be reported to the Headteacher and those about the Headteacher will be reported to the Trust board chair. A low-level concern about a supply teacher or contractor will be reported to their employer.

Where the low-level concern has been reported to the DSL, they will inform the Headteacher of the details as soon as possible,

Reporting Concerns

A summary of the low-levels concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the Headteacher a record of the conversation will be made by the Headteacher which will be signed, timed and dated.

Storing and use of Low-Level Concerns and follow up information

Low-level concerns and follow up information will be stored securely within the school safeguarding systems, with access only by the Headteacher. 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 Headteacher or those aware in the Senior Leadership Team.

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

Whenever staff leave KMPS, 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 the information contained within the record may have any reasonably likely value in terms of 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

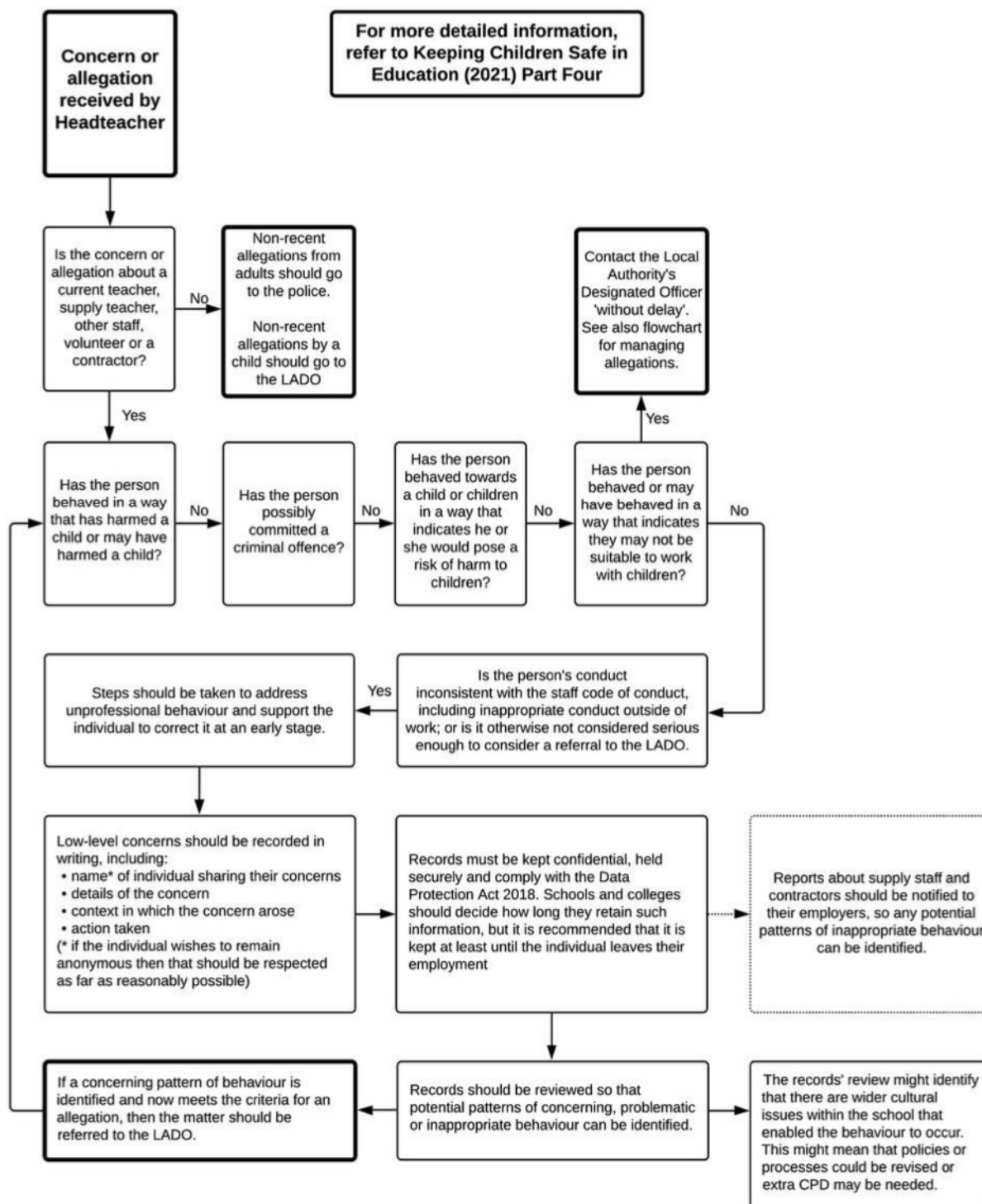
Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g where a fair disciplinary investigation is needed or where later criminal investigation is required.

Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Handbook and 'Safer Working Practice'. In these circumstances they should self-report . This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Process to follow when a Low-Level Concern is raised



What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2021) paragraph 338. 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 or college 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 LADO.