Policy: Low Level Concerns

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Mission Statement

At Abbey School our aim is to teach to inspire, motivate and nurture the next generation of creative and critical thinkers. We work in partnership with parents and the community to achieve the highest standards. Our main goal is to encourage our children to be resilient, respectful, responsible independent learners, equipped for lifelong learning. Through stimulating, safe learning environments and excellent opportunities to succeed in and out of the classroom, we encourage children's progress and achievements.

Our Core Values

RESPECT, RESPONSIBILITY, RESILIENCE

These 3 core values underpin the ethos of Abbey School. Our young pupils are encouraged to understand these values and how they develop, initially, at the micro level around themselves, their friendships, their families and our school. Later, our older pupils begin to understand how these self-same values affect our lives on the macro level, with all this means for their lives as

they grow into adults and their environment of Devon, the United Kingdom, and also the planet in which we live.

Statutory Policies

Rationale

This Policy relates to the whole school including the Early Years Foundation Stage and is reviewed annually to ensure compliance with current regulations and law and must be read in conjunction with our Safeguarding Policy and other relevant Abbey School & EYFS policies.

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Safeguarding policy are lived, monitored, and reinforced.

The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

Who does the policy apply to?

This policy applies to all staff and other individuals who work or volunteer in school.

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 school's Staff Behaviour and Code of Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the 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 their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating 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.

It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school's Staff Behaviour and Code of Conduct), are shared responsibly and 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 schools and colleges from potential false allegations or misunderstandings.

Reporting low-level concerns

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

Where the headmistress is not available, the information will be reported to a member of senior leadership team (SLT). Currently, this is the nursery manager (Karen Hunt), the DSL (Anna Payne), and the SENDCo (Sophie Temple). They will then triage the concern and take any immediate actions necessary, or pass the concern to the Headteacher on her return.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. A form to aid with the reporting of low level concerns can be found in Appendix A.

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

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The headmistress will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (in this event HR advice from Peninsula or School Insurers may also need to be taken by the headmistress)

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from Peninsula.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from Peninsula. In this case the school's Staff Behaviour and Code of Contact within the Safeguarding Policy and Disciplinary Policy will be followed

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

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 a 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 Behaviour and Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where there is no low-level concern established

Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

What is the role of the Proprietor?

The headmistress will regularly inform the Proprietor about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The Safeguarding Lead (and/or other members of SLT) may also review an anonymised sample to ensure that these concerns have been handled appropriately.

Appendix A: Low Level Record of Concern regarding a Staff Member

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with Abbey School & Nursery'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.

Where possible please speak with the Headteacher as soon as possible.

Do not discuss your concern with other members of staff.

It is also helpful to document your concerns, which can be done using this form and then passed to the Headteacher. When completed, please pass this form to the Headteacher or, in their absence, a member of senior leadership (Karen Hunt, Anna Payne, Sophie Temple).

If the concern is about the Headteacher or Proprietor, please inform LADO (Ivan Sullivan) on 01803 208541 / 07920247310

Remember, a low-level concern is different to an allegation (which uses a different form). See the table below for a definition:

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 that 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 Abbey School & Nursery'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 Abbey School & Nursery's Code of Conduct, and the law.

Name of adult writing this concern:

Name of adult whom this concern is about:

Date written:

Signature:

Details of Concern
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our policies?

For use by Headteacher (or SLT in absence)	
Date & Time concern received:	
Signature:	
Role:	
Actions to be taken and follow up:	

Directly hand this form to the Headteacher, or in their absence a member of SLT.
DO NOT DISCUSS YOUR CONCERN WITH OTHER MEMBERS OF STAFF