THE LION WORKS SCHOOL POLICY

Low Level Concerns Policy

Author of Policy and Position of Responsibility **Gill Lyon – Headteacher**	Date policy finalised **18.08.2022**
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Appendix A: Low Level Concern form

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This policy must be read in conjunction the school's full Safeguarding and Child Protection Policy. The information contained within this policy provides further information regarding the Low-Level concerns information within the full Safeguarding and Child Protection Policy.

1. Introduction

At The Lion Works School (TLWS), we are committed to creating a strong culture of safeguarding in school and fulfilling all of our statutory duties. 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 and KCSiE, including the Staff Code of Conduct and Staff Behaviour Policy. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

1. Summary

It may be possible that a member of staff acts in a way that does not cause risk or harm to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform senior leaders/DSLs about their concern using a Low-Level Record of Concern Form.

2. Legislation and guidance

This policy is compliant with and based on the following guidance:

Keeping Children Safe in Education 2022

The Independent School Standards Regulations 2014, most notably paragraph 7a and B:

"(a) arraignments are made to safeguard and promote the welfare of pupils at the school; and

(b) such arrangements have regard to any guidance issued by the Secretary of State"

Working together to Safeguard Children 2018

Local guidance via the Pan Dorset Safeguarding Children Partnership

3. Key contacts

Person/organisation	What they do	How to contact them
Mr McLaughlin	Designated Safeguarding Lead at TLWS	dave@thelionworksschool.org safeguarding@thelionworksschool.org 01202 113707
Mrs Rachel Pashley	Deputy Designated Safeguarding Lead at TLWS	rachel@thelionworksschool.org 01202 113707
Mrs Baldwin	Deputy Designated Safeguarding Lead at TLWS	kate@thelionworksschool.org 01202 113707

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Ms Lyon	Deputy Designated Safeguarding Lead at TLWS	gill@thelionworksschool.org 01202 113707
Mr Davis	Board Member with Safeguarding Lead responsibility	Governance@thelionworksschool.org 01202 113707
Laura Baldwin	Local Authority Designated Officer	Laura.Baldwin@bcpcouncil.gov.uk 01202 128058 LADO@bcpcouncil.gov.uk 01202 817600

For a full list of local contacts please consult our full Safeguarding Policy.

4. Keeping Children Safe in Education 2022

The following information is taken from Keeping Children Safe in Education September 2022:

Low-level concerns

423. As part of their whole school or college 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 or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

424. 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 or college 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?

425. 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 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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Examples of such behaviour could include, but are not limited to:

• being over friendly with children

• 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.

426. 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.

427. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

428. 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 schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

5. Allegation vs Low-Level Concern vs 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.

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

Low-Level Concern forms and follow-up information will be stored securely within the schools' safeguarding systems, with access only by the leadership team. 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 references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

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

Low-Level concerns will include "management words of advice" that relate to professionalism and conduct and any other concerns considered relevant. An individual record will be kept by the headteacher and these will be correlated onto a spreadsheet. This will allow a reviewer to correlate by concern or person in order to effectively assess whether there is a pattern of concerning behaviour.

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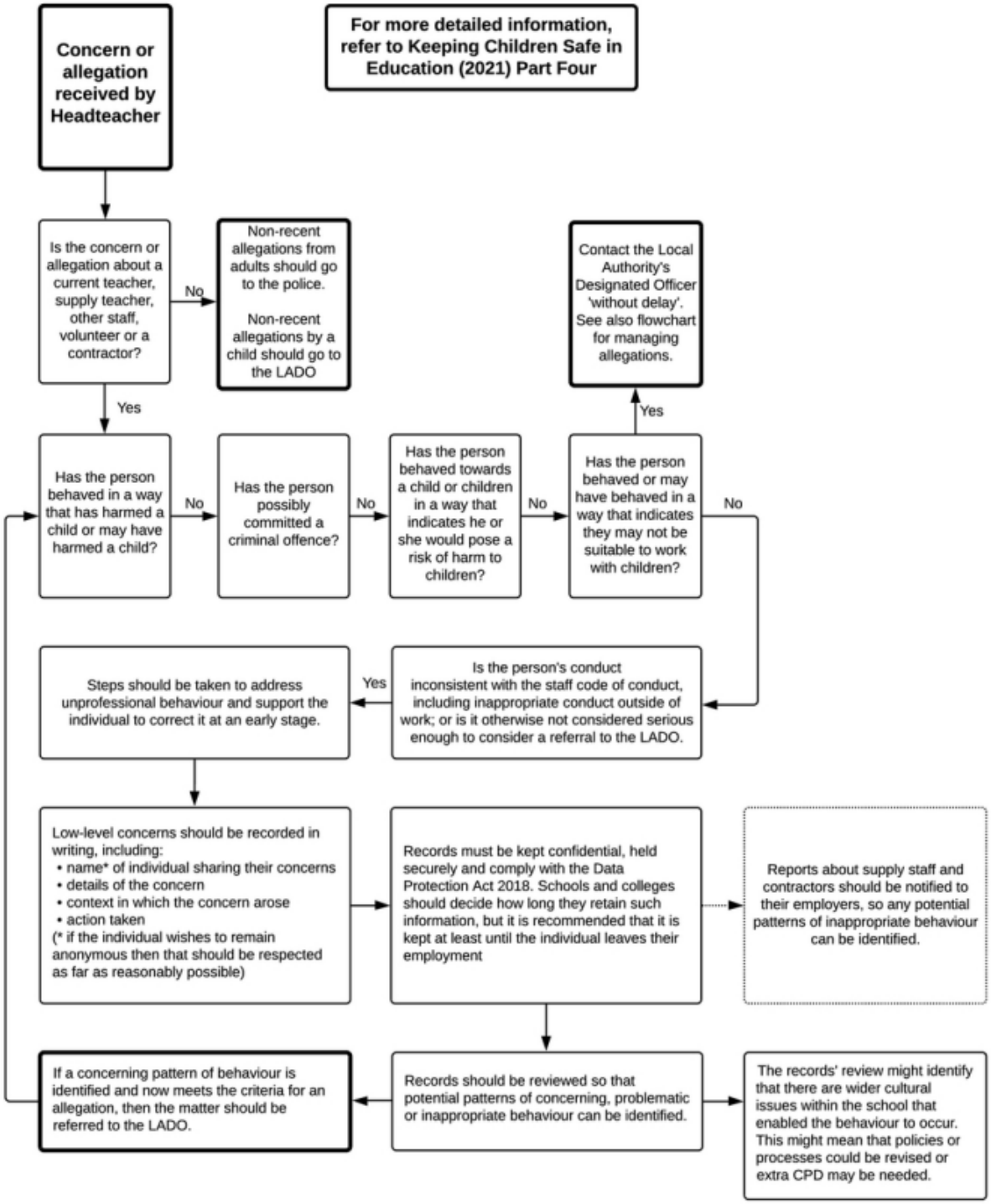
7. Process to follow when a Low-Level concern is raised



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Appendix 1: Low-Level concern form

Please use this form to share 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 the values of The Lion Works School, 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, speak with the Headteacher/DSL as soon as possible. It is also helpful to document your concerns, which can be done using this form and passed to the Headteacher/DSL. If the concern is about the Headteacher, please pass this to the proprietor or DDSL and / or LADO.

(Remember – a low-level concern is different to an allegation and should use a different policy)

Your name		Date	
The concern you have			
The reason(s) you have this concern			

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