

Grace Academy Coventry

Low Level Concerns Policy

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Contents

Policy statement 2

Scope 2

Policy aims 2

Definition 2

Avoiding low level concerning behaviour 3

Reporting a low level concern 3

Dealing with a low level concern 4

Recording a low level concern 4

Reviewing a low level concern 5

Policy statement

Our Academy recognises its statutory and moral duty to safeguard and promote the welfare of students and understands that staff play a vital role in meeting these responsibilities.

Our Academy works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the Academy are dealt with promptly and appropriately.

Scope

All employees employed at this school including:

- Teachers
- Support staff
- Supply Teachers
- Volunteers
- Local Authority visiting staff
- Contractors

The term 'staff' throughout this policy refers to all of the above.

Policy aims

To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.

To enable the Academy to identify concerning, problematic or inappropriate behaviour early.

To minimise the risk of abuse occurring.

To ensure that adults working in or on behalf of the Academy are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the Academy.

To help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Definition

The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation. 'Keeping Children Safe in Education' defines a low level concern as:

“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

However:

- If a pattern of low-level concern emerges that does suggest a risk of harm, advice should be sought from the LADO;
- The LADO may be contacted to gain further advice about a low level concern and these concerns may lead to a formal referral following discussions with the LADO.

Avoiding low level concerning behaviour

Behaviour defined as a ‘low level concern’ can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

Our school ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

- Staff Code of Conduct
- Safeguarding and Child Protection policies and regular training
- Teachers’ Standards (for teaching staff)

Reporting a low level concern

Low level concerns about a member of staff should be reported to the Principal as per the Academy’s Child Protection procedures.

If the concern is about the Headteacher this should be reported to the Chair of Governors.

Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Principal/DSL and DDSs will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report. Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Dealing with a low level concern

Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Principal. The Principal must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the Academy feel they may need further guidance on will be referred to the LADO for advice. Following advice if appropriate a referral may be made to the LADO.
- Low level concerns that the Academy feel they can deal with internally will be dealt with via the Academy's usual child protection investigation process.

The Academy will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Recording a low level concern

All low level concerns should be formally recorded by a member of staff when they are made aware of them.

This record should then be passed to the Principal (or Chair of Governors if the concern is about the Principal).

- Details of the concern.
- The context in which the concern arose.
- The outcome of the investigation and any action taken, and

- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

Relevant records will be retained confidentially on the personnel file.

A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff.

All records must be kept in line with data protection principles and will remain for the period stated in our Records Retention, Destruction and Archive Policy.

Reviewing a low level concern

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

Where a pattern of such behaviour is identified, the Principal will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Seeking advice from the LADO
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

The Academy will take advice, where appropriate, from their HR provider in respect of low level concerns.

The Academy will also review appropriate policies and training, or other wider cultural issues in the Academy, to see whether anything needs to be done to minimise the risk of similar behaviour happening again. Relevant records will be retained confidentially on the personnel file.

A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff.

All records must be kept in line with data protection principles. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference. LADO communications will be stored in the relevant personnel file and will be retained as per the Records Retention, Destruction and Archive Policy.

This policy operates in conjunction with the following policies, which can be found on the Academy website:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Data Protection Policy