

St John's C of E VA First School

**LOW LEVEL CONCERNS POLICY**



'Together we have roots to grow and the wings to fly.'

This policy should be taken as part of St. John's C. of E. First School's overall strategy and is implemented within the context of our vision of Government aims and our values as a Church of England School.

**Review**

Review Cycle	Date of Current Policy	Author(s) of Current Policy	Review Date

**Ratification**

Role	Name	Signature	Date
Chair of Governors	Claire Levene Plumb	CLAIRE LEVENE PLUMB	
Head Teacher	Teresa Gilbert	TERESA GILBERT	
DSL	Teresa Gilbert	TERESA GILBERT	

**Details of Policy Updates**

Date	Details

At St John's CEVA First 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. This policy sets out the action taken to reduce concerns arising and how low-level concerns will be dealt with.

### **Staff Induction and Support**

On taking up a post at the school (employed or voluntary), staff and volunteers receive an induction meeting with the Headteacher and Business Manager. Part of this meeting ensures that the adults understand their responsibilities in safeguarding pupils and in ensuring that their behaviour and conduct meets the expectations of the school. New staff members and volunteers are required to read the following documents and confirm that they will abide by their contents:

- 1. Staff Handbook and Code of Conduct (which is reviewed, updated and shared with staff annually in September)**
- 2. Their job description**
- 3. Keeping Children Safe in Education document – Part 1 (most up to date version)**
- 4. What to do if you're worried a child is being abused (DfE March 2015)**
- 5. St John's CEVA First School Safeguarding (Child Protection) Policy and Procedures**
- 6. St John's CEVA First School Behaviour and Relationships for Learning policy**
- 7. St John's CEVA First School Whistle blowing (raising concerns at work) policy**
- 8. Guidance on safer working practice for those working with children and young people in education settings (April 2020)**
- 9. Children Missing Education procedures**

Within the meeting the expectations in relation to staff behaviour are made clear and many of the above documents provide clarity in expectations and how staff can ensure that they do not behave in a way to cause concern. The documents also contain information on what a staff member / volunteer should do if they have concerns about the conduct or actions of another adult within the school setting, including the Headteacher.

It is hoped that this clarity in relation to expectations and behaviour will result in all staff members and volunteers behaving in an appropriate way towards pupils and other adults within the setting. It is also recognised that at times concerns and incidents may arise and need to be dealt with. Through school policy and practice, staff members and volunteers understand their responsibility to report any concerns that they have with the Headteacher, Deputy Headteacher or Chair of Governors (in respect of the Headteacher).

### **Low Level Concerns**

Keeping Children Safe in Education September 2023 details what may constitute a low-level concern and provides the following definition (page 101):

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 Local Authority Designated Officer (LADO).

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 children.

At St John's CEVA First School any incident to which another member of staff feels uncomfortable with and reports to the Headteacher, Deputy Headteacher or Chair of Governors (in respect of the Headteacher), would be dealt with as a low-level concern.

### **Dealing with a Low Level Concern**

The Headteacher or in their absence, the Deputy Headteacher would first need to establish that the concern reported to them is a low-level concern and not an allegation which would need to be managed following the County Policy and KCSIE statutory guidance. Once it has been established that the concern is low-level the following action will be taken:

- Gather further information, if required from the person reporting the concern
- Record the concern in writing including: the date, details of the concern, who the concern is about, the context in which the concern arose, the name of the individual reporting the concern (unless they have requested to remain anonymous which should be respected as far as reasonably possible)
- Consider the information and whether the behaviour is in line with the staff code of conduct
- If the behaviour reported contravenes the staff code of conduct, then further action is required
- Meet with the member of staff in relation to the concern which has been reported and discuss the concern with them; ensuring that they are given the opportunity to share any information that they have about the situation / incident – record this information
- Support the member of staff with addressing the concern and identify any support or training which may be required
- Identify school policies and guidance which may need to be viewed by the member of staff as a reminder of school expectations and code of conduct
- Record the action taken, advice and support given
- Continue to monitor practice and whether any further concerns are raised

When concerns have been dealt with, the paperwork must be stored securely and confidentially (complying with the Data Protection Act 2018 and UK GDPR).

If in the future, further concerns are reported in relation to the same member of staff, it is important that past concerns are viewed to identify any patterns in behaviour. It will also be necessary to consider whether the concerns now meet the harm threshold and need to be referred to the LADO or whether action needs to be taken through the disciplinary process.

### **Retention and Reporting of Low-Level Concerns**

Records of low-level concerns will be retained while the member of staff is employed at the school.

Low level concerns must not be included in references for staff members unless:

- The concern related to misconduct or poor performance
- The concern met the threshold for referral to the LADO and was substantiated

### **Learning from Concerns**

Low level concern records should be reviewed regularly and where patterns of similar behaviours are seen, the context of the school ethos, policies and practices should be reviewed. Where necessary, whole staff training should take place to address areas of practice that need improving in order to improve staff conduct and reduce concern.