

Holme Grange School

Whole School Policy Including EYFS



Low Level Concerns Policy

Date:	Amendment:	Reviewed by:	Authorised by:
September 2022	Next review due		
September 2021	New Policy	J Cooke	

Low-Level Concerns Policy

The overarching aim of Holme Grange School's low-level concern policy and guidance is to facilitate a culture in which Holme Grange School's values, habits and expected behaviours which are set out in the staff Code of Conduct and the Holme Grange Way are lived, constantly monitored and reinforced by all staff.

The intention of this statement is to:

- Maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- Ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct.
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised

Keeping Children Safe in Education (2021) states that "Governing bodies and proprietors should have policies and processes to deal with concerns which do not meet the threshold (as set out in Section 1 of Part 4 of KCSIE, 2021

The aims of this policy are to:

- Empower staff to feel confident in distinguishing between what is expected and appropriate behaviour from concerning and problematic behaviour, in themselves and others;
- Empower staff to share low level concerns with the DSL or the Head teacher;
- Address unprofessional behaviour and support the individual to correct it at an early stage;
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- Help identify any weaknesses in Holme Grange School's safeguarding system and address these needs with further training and / or providing information.

This policy applies to all adults who work at Holme Grange School, contractors, volunteers and any visitors.

What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if a 'niggling doubt', that an adult may have acted in a manner inconsistent with Holme Grange School's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

KCSIE (2021) gives examples of such behaviour:-

Being over friendly towards 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
- Using inappropriate language – sexualised, intimidating or offensive language

From time to time an individual may find themselves in a situation which might appear compromising to others or which could be misconstrued. It is recognised that this could be through no fault of their own. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such Holme Grange School sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What should I do if I have a low-level concern?

Where a low-level concern arises, it should be reported to the DSL, Mrs Jo Cooke or another member of the Safeguarding Team – whoever the individual feels more comfortable speaking to - using the appropriate form (Appendix B) or email as soon as reasonably possible and in any event within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low-level concern be handled?

Whoever has received the low-level concern will discuss the content with the Mrs Jo Cooke (or a member of the Safeguarding team if preferred) as soon as possible and in any event within 24 hours of becoming aware of it.

Should the Low-Level Concern be of a more serious nature (this will be determined by the DSL), it will be shared with the Headteacher, Mrs Robinson, (as required by KCSIE 2021) and a suitable pathway discussed (see below).

The circumstances in which a low-level concern might be reclassified and it is agreed that the threshold for an allegation has been reached are: where:

- The threshold is met for a higher-level concern/allegation (as set out in KCSIE 2021, Part 4, section 1)
- There is a pattern of low-level concerns which collectively amount to a higher-level

concern/allegation

- There is other information which when considered leads to a higher-level concern/allegation.

Where the DSL and/or the Headteacher are in any doubt whatsoever, advice will be sought from theLADO, if necessary on a no-names basis.

Having established that the concern is low-level, Mrs Jo Cooke or Mrs Robinson will discuss the next steps forward. This may involve speaking with the individual who has raised it and taking any other steps to investigate it as necessary. It may also involve having discussions with HR (this may be done by having a “no names” conversation), and the DSL to see what might be the most appropriate way forward and which would be the most helpful and supportive for the individuals concerned. Most low-level concerns, by their very nature, are likely to be minor and will be dealt with by means of management guidance, training or any other relevant intervention.

There is a flow chart in Appendix A which outlines the process.

Concerns about reporting

All staff should be reassured that reporting a low-level concern could just indicate that a member of staff requires extra training or isn't aware that their actions could result in allegations. By bringing your concern forward you could do much to help an individual in their professional development and learning as well as helping to prevent a false allegation from occurring.

It will be possible for your identity to be kept anonymous, provided the allegation does not cross any safeguarding thresholds.

If any individual feels unhappy with any stage of the process, and particularly that they are not being listened to and their low-level concern is not being heard, they may contact Holme Grange School's Safeguarding Governor, Railton Blyth rblyth.hggovernor@holmegrange.org

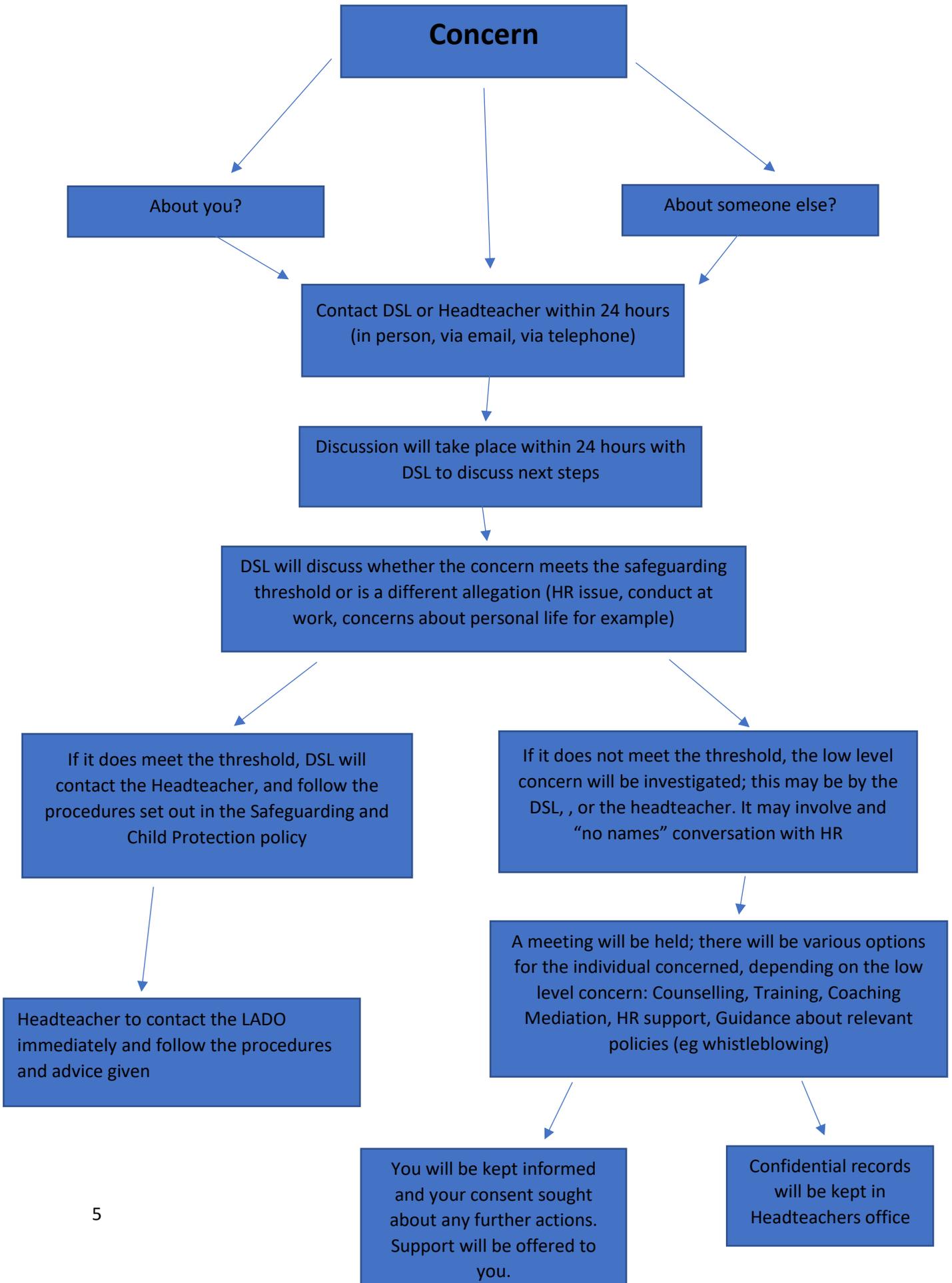
What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file overseen by the Headteacher, Mrs Robinson. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either (a) the concern (or group of concerns) has been reclassified as a higher-level concern as above or (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the School's grievance, capability or disciplinary procedure.

The confidential record will include details of the concern, the context in which the concern arose and any action taken. The name of the individual sharing the concern is noted. Records are reviewed annually to ascertain any potential patterns of concerning or inappropriate behaviours – whether this be regards an individual or Holme Grange School culture as a whole. The review will be presented to a Governing Board meeting with any recommendations as to whether further or revised training should be implemented as a result.

The record of an individual will be kept for the duration that the individual is employed at Holme Grange School and for 5 years thereafter.

Appendix A



Received by	At: (time)	On: (date)
The action taken – (specify)		

Signed:	Time & Date
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This record will be held securely in accordance with Holme Grange School’s Low-Level Concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Holme Grange School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.