Malvern Wells CE Primary School

Low Level Concerns Policy

'Let Your Light Shine.'

We aspire for everyone at Malvern Wells to be the BRIGHTEST version of themselves, equipped with the knowledge that they are unconditionally loved by God who sees their intrinsic value, free to take risks, make mistakes and grow in the safety of his forgiveness ready for the plans and purposes He has in store for their bright future.

Let YOUR Light Shine by Letting His Light Shine through You!

Schools HR Consultancy
Employment Policies & Procedures

LOW LEVEL CONCERNS POLICY



worcestershire county council

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1. Introduction

This policy applies to all concerns (including allegations) about members of staff, including supply teachers, governors, volunteers and contractors, which do not meet the harm threshold.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

2. What is a low level concern?

Any concerns will be responded to in a timely manner to safeguard the welfare of children.

The term 'low-level' concern is any concern, no matter how small, that an adult working in or on behalf of the school 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 designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating children
- 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

3. Managing low-level concerns

The school promotes a culture of openness, trust and transparency in which all staff feel confident to raise concerns, including about their own behaviour.

Staff are encouraged to self-refer where they:



- recognise that their behaviour may have been misinterpreted
- believe they may have acted outside expected professional standards
- have placed themselves in a situation that could give rise to concern or risk

Self-referrals will be handled in a supportive, proportionate and timely manner, with the primary focus on:

- safeguarding children
- maintaining professional standards
- supporting staff to reflect and improve practice

Where appropriate, self referrals will be managed under this policy or, if the threshold is met, referred to the Local Authority Designated Officer (LADO).

Schools should:

- Ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others Managing allegations against staff
- Empower staff to share any low-level concerns
- Empower staff 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.
- Address unprofessional behaviour and supporting the individual to correct it at an early stage
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

4. Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine if any further action is necessary (i.e. management guidance letter). If further guidance is required then the LADO and/or Human Resources can be consulted.

If a concern is raised about the Headteacher then this will be referred to the Chair of Governors



5. Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
- Retained until the individual leaves employment at the school and then in line with GDPR requirements

Where a low-level concern relates to a supply teacher or contractor, the school will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

6. References

The school will **not** include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO and was found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Information provided must be true, accurate, fair and not misleading.

7. Further Advice

For further advice, please contact the Schools HR Consultancy Team on 01905 844560 or via SchoolsHRconsultancy@worcestershire.gov.uk



8. Policy History

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