

1. INTRODUCTION

- 1.1 Tudor Hall and Carrdus School operate a safeguarding culture and ethos in which the values and expected behaviours of staff are set out in the Staff *'Code of Conduct'*. These should be demonstrated, monitored, and reinforced by all staff.
- 1.2 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the allegation threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 1.3 We do all we can to ensure that all adults living and working at Tudor Hall and Carrdus School are confident and clear about expected behaviours of themselves and their colleagues, the delineation of professional boundaries and reporting lines.
- 1.4 We promote a culture of trust, awareness and positive values in which staff can recognise concerning or inappropriate behaviour, either in themselves or in other adults.
- 1.5 We empower staff to share their concerns, whether about their own or a colleague's behaviour, with the Head, and help staff to interpret the sharing of a concern as a neutral act.
- 1.6 We address unprofessional behaviour swiftly and help staff to correct such behaviour at an early stage.

2. DEFINITION OF A LOW-LEVEL CONCERN

- 2.1 A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' which can include:
 - 2.1.1 an adult may have acted in a manner inconsistent with either the School's *'Code of Conduct'* or the *'Safeguarding Policy'*, or
 - 2.1.2 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.

3. SPECTRUM OF BEHAVIOUR

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

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.

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

4. REPORTING LOW-LEVEL CONCERNS

- 4.1 It is important that staff feel comfortable and are clear about, the concept of low-level concerns and that they do not need to be able to determine in each case whether their concern is a low-level concern or if in fact, it is serious enough to consider a referral to the LADO or meets the threshold of an allegation.
- 4.2 Reporting of a low-level concern is a neutral act and the Head (or in the case of a concern regarding the Head, the Chair of Governors) will determine how best to deal with the matter.
- 4.3 Where a staff member has a low-level concern about a member of staff, it should be reported to the Head who will determine the next course of action.
- 4.4 Where the low-level concern raised is about the Head, it should be reported to the Chair of Governors.
- 4.5 Members of staff can self-refer if they find themselves in a situation which could be misinterpreted or might appear compromising to others or if they have behaved in a manner, on reflection, they consider falls below the standard set out in the Code of Conduct.

5. RESPONSE TO THE LOW-LEVEL CONCERN

- 5.1 On receipt of a report of a low-level concern, the Head will speak with the member of staff who has raised the concern, review the nature of the concern, and give consideration as to whether any concerns have been raised about the individual in the past.
- 5.2 Where the concern is regarded as a Safeguarding issue, the School's '*Safeguarding Policy*' and procedures come into action.
- 5.3 If the concern is established as low-level, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when

raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstanding.

- 5.4 The Head will decide who would be the most appropriate person in the school to deal with the matter. This would normally be the line manager of the individual about whom the concerns have been raised.
- 5.5 Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any on-going concern and accordingly will not require any further action. Others will be most appropriately dealt with by means of management guidance and/or training.
- 5.6 In many cases, a low-level concern will simply require a values-based conversation with the individual about whom the concern has been raised to help maintain a positive professional relationship with the member of staff concerned.
- 5.7 Any such conversation should be recorded and should include being clear with the individual why their behaviour is inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the inappropriate behaviour. On some occasions, ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual and regularly reviewed with them may also be appropriate.
- 5.8 The Head may determine that some low-level concerns are matters of misconduct or poor performance, in which case, the relevant disciplinary grievance or whistleblowing procedures will be followed. If there is any doubt, the Head will seek advice, including from the LADO, where appropriate.

6. THE ROLE OF STAFF

- 6.1 Staff are encouraged to report any concerns they have within 48 hours of them first becoming a concern.
- 6.2 If the staff member who raises the concern does not wish to be named, then the school will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary investigation) and for this reason, anonymity will never be promised to members of staff who report low-level concerns. Where possible, staff are encouraged to consent to be named as this will help to create a culture of openness and transparency.
- 6.3 Staff are given the option of either discussing their low-level concern verbally or providing a written summary of it on the '*Low-Level Concerns Reporting Form*' (see **Appendix 1**). Where the low-level concern is provided verbally, the Head will make a record of the conversation on a '*Low-Level Concerns Reporting Form*', either contemporaneously or immediately following the discussion.
- 6.4 Unless exceptional circumstances apply (for example, providing a copy would create a real risk of harm to any adult or child), the member of staff about whom the concern has been raised should be asked if they would like to see a copy of the record made on conclusion of the case.

7. RECORD KEEPING

- 7.1 All records of low-level concerns will be retained in a central low-level concerns file which will remain confidential and kept securely in the Head's office with access limited to the Head, Designated Safeguarding Lead (DSL), and Safeguarding Governor.

- 7.2 Although the record of the low-level concern should be placed in a central file, some concerns may also involve issues of misconduct or poor performance, or they may trigger a procedure such as a grievance or whistleblowing. Where these issues would ordinarily require a record to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the low-level concerns record.
- 7.3 When a low-level concern is re-classified as a safeguarding concern/allegation, all records of low-level concerns relating to that individual are kept in the central low-level concerns file at both Carrdus and Tudor and can only be accessed by the Head. The record of concern is required to be a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept as a record within the low level concerns file and securely kept in a lockable cabinet. A copy will be provided to the person concerned.
- 7.4 Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference such as, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.
- 7.5 The DSL and the Head will review the low-level concerns file periodically to ensure that concerns are being dealt with appropriately and that any patterns of concerning behaviour are identified. A record of these reviews should be made.

8. THE ROLE OF THE GOVERNORS

- 8.1 The DSL should regularly inform the Governing Body about the implementation of the low-level concerns policy and any evidence as to its effectiveness annually in the DSL's Safeguarding Report.
- 8.2 The Governing Body will also review an anonymised sample of low-level concerns at regular intervals in order to ensure that these concerns have been responded to appropriately.

9. LOW LEVEL CONCERN THRESHOLD

- 9.1 If a staff member has more than 3 low level concerns logged against their name, they will be asked to attend a meeting with the Head to discuss the nature of the concerns, whether support needs to be put in place or the concerns need to be escalated to.

Written by Head: April 2022

Approved by Education & Welfare Committee: May 2022

Reviewed by DSL: September 2024



REPORTING LOW-LEVEL CONCERNS

Please use this form to share any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- Is not consistent with Tudor Hall's Code of Conduct, and/or
- Relates to their conduct outside of work, even if not linked to a particular act or omission, has caused a sense of unease about the adult's suitability to work with children.

You should provide a concise record, including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible, of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Details of Concern

Name of staff member:

Department and Role:

Signed:

Time and Date:

Received by:

At (time):

On (date):

Action taken (specify):

Signed:

Time and Date: