



HOLMEWOOD HOUSE SCHOOL

Low-Level Concerns Policy

This Low-Level Concerns Policy operates in conjunction (as appropriate) with the following:

- Staff Code of Conduct
- Supervision of Pupils
- Safeguarding and Child Protection Policy
- Acceptable use of technology (Staff)
- Disciplinary Procedure
- Capability Procedure
- Grievance Procedure
- Whistleblowing Policy
- Data Protection Policy

This policy should be read in conjunction with the School's Safeguarding and Child Protection Policy, Staff Code of Conduct and Whistleblowing Policy. The aim of the policy and flagging 'Low Level' Concerns is to enable staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

Rationale

The purpose of the policy is to create and embed a culture of trust and transparency with clear values and expectations.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy. (KCSIE 202)

Allegations involving staff primarily fall into two levels of concern:

- Allegations that may meet the harm threshold.
- Allegations/concerns that do not meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.

What is a Low-Level Concern?

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 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 pupils.

Recording Low-Level Concerns

All Low-Level Concerns should be recorded using the following form – Reporting Low Level Concern Form. This is available as a link on the intranet page. If the form is not accessible you should speak to the Head directly. Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case will be referred to the LADO.

Low Level Concerns about the Head

All Low-Level concerns about Head should be sent to the Chair of Governors who should decide on a course of action, either through the school's disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case will be referred to the LADO.

Self-Reporting

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct.

Storing, Reviewing and Sharing Low-Level Concerns

The Head will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a regular basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

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, 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.

Records are reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

As part of the review process consideration will be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and, if appropriate policies will be revised or extra training delivered to minimise the risk of it happening again.

Procedure for Responding to a Low-Level Concern

Concern Raised via the 'Low-Level Concern' Form.	<ul style="list-style-type: none"> • If the form is not accessible, colleagues should speak to the Head directly. • Staff will receive an email receipt once they have submitted the 'Low-Level Form'. 	<ul style="list-style-type: none"> • The Head will send an acknowledgement email before the end of the following working day.
Information gathering	<ul style="list-style-type: none"> • The Head may investigate the allegation or concern independently or delegate the investigation process to another member of the SLT. • In all cases, the Head will consult with the DSL 	<ul style="list-style-type: none"> • The Head (or delegated member of the SLT) will conduct the investigation within seven working days.
Follow up actions	<ul style="list-style-type: none"> • In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Details of the concern will be recorded along with the rationale for decisions and action taken • If the Head or the DSL have any doubts or further concerns, they will consult the LADO for further advice. 	<ul style="list-style-type: none"> • The member(s) of staff will be informed of the process(es) taken and the follow up actions. • In certain situations the HR department may also be involved in processes and actions
Escalation	<ul style="list-style-type: none"> • If the concern is recognised as having met the harm threshold, the matter will be dealt with in accordance with the Safeguarding and Child Protection Policy – Managing allegations involving staff. 	<ul style="list-style-type: none"> •
Retaining Information	<ul style="list-style-type: none"> • KCSIE 2023 recommends that all information relating to concerns or allegations raised involving a member of staff are retained by the school until the individual leaves their employment. 	
Sharing Information	<ul style="list-style-type: none"> • Part Three KCSIE 2023 guidance is clear that schools should only provide substantiated safeguarding concerns or allegations that meet the harm threshold in references 	

Contact details for the LADO
Telephone: 03000 410888
Email: kentchildrenslado@kent.gov.uk

Integrated Children's Services
Front door: 03000 411111
Out of Hours Number: 03000 419191

Worried about a child?
Report to Kent Children's Portal:
<https://www.kscmp.org.uk/>

Immediate Risk of Harm
Call 999