



## **PACKWOOD HAUGH SCHOOL (Including EYFS)**

### **Low Level Concerns Policy**

#### **Introduction**

Packwood Haugh School is committed to the safeguarding and health, safety and welfare of all of our children here at school, and this is of huge importance to all the adults who work within Packwood Haugh. Our children have the right to be safe, treated equally and be protected. Safeguarding is the responsibility of everyone in school, and all adults employed by the school should remain *professionally curious* to embed a culture of safeguarding.

This policy should be read in conjunction with the Safeguarding Policy, the Staff Code of Conduct and Whistle Blowing Policy. It is vital staff feel enabled to share their concerns, no matter how small about another member of staff's behaviour.

This policy has been written taking into account the work of Farrer & Co 'low level concerns guidance' and KCSIE 2023.

This policy applies to all staff and other individuals (including volunteers) who work at school either directly with the students or contractors. This is a whole school policy, including EYFS.

#### **What are the aims of this policy?**

- To ensure that staff are clear about the procedures for reporting concerning behaviour.
- To address unprofessional behaviour and support the individual to correct it at any early stage.
- To identify concerning, problematic or inappropriate behaviour, including any patterns that may need to be consulted on or referred to the local authority designated officer (LADO, on a no names basis if appropriate).
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised.

- Help identify any weak spots in the School's safeguarding system and help inform regular review of procedures.
- To create and embed a culture of trust, transparency and openness in which the clear values and expected behaviour which are set out in the Staff Code of Conduct are consistently lived, monitored and reinforced by all staff.

The Low Level Concerns policy enables all staff to share any concerns, no matter how small, about their own or another member of staff's behaviour with the Head.

The term '*low level concern*' does not mean that it is insignificant; it means that an adult's behaviour towards a child does not meet the harm threshold, but does raise a cause for concern.

*Farrer & Co state that; Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, and recorded and dealt with appropriately, is crucial. If implemented well this should encourage an open and transparent culture; enable organisations to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or behalf of the organisation are clear about professional boundaries and act within them, in accordance with the ethos and values of the organisation.*

### **What is a low level concern?**

A low level concern is when an adult's behaviour that does not meet the harm threshold, but is not consistent with the standards and values of Packwood's and which falls below the expectations outlined in the school **Staff Code of Conduct**. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

For example, this may include, but is not an exhaustive list:

- Being over-friendly with students
- Having favourites
- Taking photographs of students on a personal device
- Engaging in one-to-one activities with children where they cannot easily be seen
- Using inappropriate language
- Humiliating students

Low level concerns can include inappropriate conduct inside and outside of work.

### **Who can raise a low level concern?**

Low level concerns can be raised by staff members, parents or a child. If anyone has a concern, they should raise it in the correct way, in a timely manner.

It is also important the correct process and procedures are followed, to deal with any issues raised, to help avoid any false allegations, or misconceptions around a behaviour.

## **Self-reporting**

A staff member 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.

Staff are encouraged to self-report. It is self-protective and enables a potentially difficult issue to be addressed at the earliest opportunity.

It demonstrates awareness of the expected standards and self-awareness as to one's own actions, and how these might be perceived by others.

At Packwood Haugh we need to adhere to the highest standards, and a culture that allows this, self-reporting helps to strengthen this culture.

### **Self-reporting is a positive action**

All staff need to be informed about, and be able to identify concerning, problematic or inappropriate behaviour, and understand the importance of sharing concerns when they observe behaviour which goes against the School Code of Conduct. This is done by ensuring all staff read this policy, and attend relevant staff briefings, insets and any training as required.

The Low Level Concerns policy also acts as a monitor to gauge effectiveness of training and culture. At Packwood Haugh, staff are informed about identifying concerning, problematic or inappropriate behaviour, rather than think they can recognise dangerous people, they can be prepared to act when they observe behaviour which violates the Staff Code of Conduct.

Staff are also trained on specific behaviour to be aware of, and are encouraged and empowered to share any concerns about behaviour that is not appropriate. Intrinsic to this is, discussing during training real life examples of the consequences of failing to report.

It is important to note, if a member of staff has a concern, they do not have to establish if it is 'low level' or not but to know the procedures in place in which to raise the concern in the first place.

Once staff share what they believe to be a low level concern, that determination should be made by the Head. This can be done in consultation with the Head of Safeguarding.

### **Staff Code of Conduct**

A robust Staff Code of Conduct is in place at Packwood Haugh which reflects and reinforces this policy. There is commitment from leadership to adhere to, enforce and reinforce the Staff Code of Conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status.

Staff are asked to read and sign the Staff Code of Conduct on an annual basis, so that everyone is familiar with it and clear on the standard of behaviour expected of them – it is a live document and applies to all levels of school.

### **How do I report a low level concern?**

If a member of staff has a concern to raise, they should raise this in person or via the Microsoft form) to the Head (or in their absence the Head of Safeguarding or a DDSL).

If the concern is about the Head, they should contact the Chair of Governors, Tim Haynes, via the School Bursar.

The Head will make a record of this to include:

- Details of the concern
- The context in which the concern arose
- Action taken

The name of the individual raising the concern should also be noted, but if they wish to remain anonymous, this should be respected as far as reasonably possible although in some circumstances, this may not be possible in the event of legal obligations.

Concerns cannot be raised anonymously i.e. an anonymous note or Microsoft form where the email is hidden.

The concern can also be recorded via the LLC Microsoft form which can be found on the Intranet in the Low Level Concerns Tab. Hard copies can be located in the Staff Room, School Office, Bursar's Department and Catering Office or ask Sue Rigby.

The Head will discuss the concern with the individual who raised it, and will take steps to investigate if needed.

The Head will respond sensitively and in a proportionate way to any concerns raised. They may discuss the concern with the Head of Safeguarding. If there is any doubt whatsoever, the Head must seek advice from the LADO on a no names basis. In the first instance, the LADO will act on a consultation basis.

Low level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. Should supply staff or a contractor wish to self-report an incident, they may request a paper copy of the form from the School Office or Assistant Bursar which will be securely handed to the Head, or request to see the Head or Head of Safeguarding.

Most low level concerns by their nature are likely to be minor and dealt with by guidance, training and support.

In most cases, a low level concern will simply require a conversation with the individual about whom the concern was raised.

The Head will securely retain confidential files on low level concerns. The central log of these will be shared and monitored with the SLT on a monthly basis to ensure issues are being dealt with appropriately and promptly, and that potential patterns are identified. This review will be noted in SLT meeting minutes.

It is important that concerns when raised will be dealt with promptly and effectively, whilst on the other hand protecting staff from potential false allegations or misunderstandings. Any investigation of low level concerns will be dealt with discreetly on a need to know basis.

Where a pattern of behaviour is identified in respect to an individual, the Head will consider if there are wider cultural issues at play, and whether safeguarding and relevant policies need reviewing or that training needs to be arranged for staff to reduce the risk of the same issues occurring again.

### **How long are records kept for?**

Low level concerns are kept for as long as is deemed relevant for Safeguarding purposes. In most cases once a staff member leaves the school, any concerns relating to them are retained for the duration of their personnel file and will not be included in any onward reference unless it meets the threshold for LADO referral (either as an individual concern or a group of concerns.)

### **Role of the Governors**

The Head will inform Governors about the implementation of the Low Level Concerns policy and the evidence of its effectiveness.

The Safeguarding Governor will also review an anonymised sample to ensure that concerns have been handled appropriately.

This policy is reviewed on a yearly basis.

<b>Authorised by the Governing Body:</b> Yes      Date: 17/10/2024
<b>Produced by:</b> Sue Rigby 01/09/2024
<b>Date Disseminated to the Staff via the intranet:</b> 01/09/2024
<b>Date of Review:</b> 17/10/2025
<b>Signed:</b> <i>James Pitt</i> , Chair of Governors

## Appendix A- **Low level Concerns Reporting form**

Please use this form to share a concern, even if this no more than a ‘nagging doubt’ that an adult may have acted in a way that is not consistent with the School’s Staff Code of Conduct.

Please make your report concise, keeping it factual, and accurate. Please include:

- Details of the concern including, times, dates and other relevant information
- The context in which the concern arose
- Any following conversations, or action taken

**Concern raised: is this a self-referral? Y/N** Name of staff member:

Role:

Detail of the Concern raised:

Your Name:

Date:

*This record will be held securely in accordance with the Low Level Concerns policy.*

**Appendix B: Flow chart for reporting concerns**

**Concern relating to a child** → Any concern a child is suffering harm or abuse or there is a specific safeguarding issue → Staff follow school Safeguarding policy → **Notify Head of Safeguarding /DDSL**

**Low Level Concern** → Any concern that an adult has acted in a manner that is contrary to the Staff Code of Conduct, or conduct that causes a sense of unease or a nagging doubt. This can be about another adult or a self-referral → **Notify the Head**

**Allegation** → Behaviour which indicates a member of staff 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, or behaved in a way towards a child or children that would indicate they pose a risk of harm to children → **Notify the Head**