



DANESHILL SCHOOL

**LOW-LEVEL CONCERN
POLICY**

**This policy applies to all parts of Daneshill School including
The Early Years Foundation Stage.**

**Created: April 2021
Last Reviewed: September 2022
Next review date: September 2023**

Introduction

At Daneshill, we aim to create an open and transparent culture where all concerns about all adults involved with our schools are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries. Creating a culture in which all concerns about adults (including those that do not meet the threshold of an allegation) are shared responsibly and with the right person, and recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage a more open and transparent culture; enable us to identify concerning behaviour early; minimise the risk of abuse; and ensure that adults working within the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of Daneshill School. This policy should be read alongside our Safeguarding and Child Protection, Whistleblowing, and Staff Code of Conduct Policies.

What is a Low Level Concern?

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 inappropriate. This refers to when an allegation against a member of staff is not at the threshold where they are deemed an immediate risk to a child. Contacting the LADO at this stage, for example, may not be necessary. The adult in question may display behaviours or language which is not in accordance with the school’s values or ethos. This might, for example, include conduct outside of the school.

Examples of a Low Level Concern

- An adult who appears to have obvious favourites
- The use of offensive, sexualised or intimidating language
- Being over-friendly with certain children
- Choosing to participate in activities behind closed doors, one to one with a child

- Insisting on always being with a particular child/children on trips/fixtures
- Creating invitation-only informal groups which appear to create opportunities which others are not part of
- Insisting on certain children in a form group or class
- Constant gifts, such as sweets

Staff behaviour which causes alarm

- Staff who befriend families online who they have met through their role at Daneshill School
- Staff who come to mind in Safer Recruitment/Safeguarding training ('flying low of radar')
- Staff who shout or speak disrespectfully to or about children
- Staff who adopt risky 'alter egos' online
- Staff who are online 'influencers' and use their role within Penpol School to meet their own needs (for example, to promote their own business or enterprise)
- Staff who 'like' or 'share' inappropriate/extreme material or opinions on social media (for example, making, liking or sharing derogatory comments about individuals or groups with protected characteristics)
- Staff who are unable to safeguard their own children
- Staff who display coercive/controlling behaviour outside or inside the workplace

In many cases, many of these behaviours may in fact be innocent, but it is the lack of awareness, acknowledgment and passing on of these which may lead to the grooming and subsequent abuse of a child. Please maintain the approach that **“It could happen here”** and **“The fact that this person is a colleague and friend of mine, who I have known for some time”** does **not** warrant an exception to this.

What to do if there is a Low Level Concern?

It may be possible that a member of staff acts in a way that does not cause risk to children but is however inappropriate. We are committed to cultivating a culture of staff being able to, in a safe and professional manner, challenge behaviours that cause offense or cause an atmosphere of feeling uncomfortable. All staff are requested to utilise their understanding of peer-on peer abuse training and mindset when giving and receiving feedback on behaviour to/from colleagues and how to resolve low level behaviours within our work force. Any member of staff who has a concern about the action/s of another member of staff, volunteer or contractor, or who on reflection, recognises that their own actions could have been viewed as concerning should inform the **Headteacher**. The DSL and DDSL may also be contacted in their absence.

These concerns will be recorded as a “note of concern,” and appropriate conversations will be had with the individual, and close monitoring of their behaviours will take place. Only the Headteacher, DSL and DDSLs have access to these records on ISAMS. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher and DSL. All staff are responsible for addressing and reporting low level behaviour concerns as individuals and not as a group. We recognise that a low-level concern about a member of staff may be raised by an external agency, community or family member. In this instance it will be the Headteacher’s responsibility have an open and honest discussion with the member of staff.

Staff should be assured that we understand that dynamics/relationships within families, neighbours and friendship groups can break down and the Headteacher will be mindful of assessing delicate personal details. Concerns of this nature will be handled with respect alongside your human right to have a ‘personal life’ and protect from malicious allegations. However, any actions that impact on the wellbeing of children and/or vulnerable adults cannot be ignored.

Process to follow as Headteacher

It may not be necessary to name the complainant unless the concern is escalated to formal proceedings. (see relevant policy – Safeguarding; Complaint; Staff Code of Conduct; Whistleblowing) The Headteacher will discuss:

- what changes need to be made
- agree a support plan if required
- any further action
- consequences of repeated behaviour/actions
- time scale (normally immediate)

The Headteacher will be mindful of disguised compliance, where the staff member says what is required but minimises said behaviours/actions and little changes. The member of staff will be directed not to discuss with colleagues and attempt to investigate where the reported concern came from. Please remember this policy is focused at keeping children, community, and staff safe.

Record keeping and passing on information

Should staff leave Daneshill School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim.

The treatment of personal data for the purpose of personnel files and references is important. KCSIE requires schools to retain a copy of all substantiated, unsubstantiated or false allegations on a staff member's personnel file but to refer only to substantiated allegations in references. Low-level concerns which do not individually or collectively meet the threshold for referral to the LADO will be retained in a confidential, school safeguarding file but not on personnel files or used on references.

The recording of information should be done following the exercise of sound professional judgement as to what information is necessary for safeguarding purposes. That information, once recorded, itself must be carefully treated, in terms of who has access to it, and who needs to know, oversee and review its contents (remembering that individuals have the right to access these records about them under data protection law).

Guidelines for Headteachers/DSLs Implementation

The way in which the policy is communicated to staff is key. Carefully designed training that is engaging and includes scenario-based discussions should encourage buy-in from staff and volunteers and help to achieve the policy's objectives. In contrast, poor communication of the policy can create suspicion, confusion and toxicity which could be highly damaging to the organisational culture, decreasing rather than increasing reporting.

Allegations v concerns

The relationship between low-level concerns and allegations should be made clear. For example, the headteacher/DSL receiving the low-level concern must always consider whether it meets the threshold for reporting to the designated officer of the local authority as an allegation. If they are in any doubt, they should contact the designated officer for advice. Equally, a series of low-level concerns may cumulatively meet the threshold and need to be treated as such. Reporting lines – ideally all concerns should be reported to one person so that patterns can be identified.

Handling concerns

Handling concerns appropriately and proportionately will strengthen confidence of staff and volunteers. In contrast, handling concerns disproportionately or inappropriately will decrease rather than increase reporting. The way in which concerns are handled, and the identity of the person handling them, will depend on the context and nature of the concern being raised.

Oversight and review

The regular review of low-level concerns by the Headteacher and DSL is required to ensure that the concerns are being handled appropriately and proportionately, that no concerns meet the threshold of an allegation, and that any subtle patterns of behaviour are spotted. Getting these points right should create a solid foundation to a transparent culture in which all concerns are shared openly and acted on appropriately. By contrast it can be hard to retrieve a situation if these areas are not considered carefully at the outset. This policy was approved and will be updated in line with annual changes to KCSIE.