

2024



Staff Low-Level Concerns Policy

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Author :

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Next Review :

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Pictor Academy is a school for pupils with additional complex needs with associated difficulties in the areas of communication and interaction, social interaction, and sensory processing. Some may have a diagnosis e.g. Autism, Down Syndrome. In addition, pupils may have sensory or physical difficulties e.g. visual and hearing impairments.

Pictor Academy is fully committed to safeguarding and promoting the welfare of all pupils. As a school, this includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the staff regarding Low-Level concerns they might have.

AIMS AND PRINCIPLES

The main aims of this policy statement are to ensure that staff are fully engaged in being vigilant and aware of Low-Level concerns and that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our pupils are safe from harm. The principle objectives are that:

- It is possible that a member of staff could act in a manner that although does not cause a risk, it may be inappropriate.
- It is the responsibility of both the Executive Headteacher and the Head of School to ensure that staff are aware of the need to record any concerns raised by a staff member about another staff member.
- Staff are aware of how to record these concerns.

DEFINITIONS AND INDICATORS

The document 'Keeping Children Safe in Education (September 2024) provides the following definition of a low-level concern:

409. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338. 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
410. 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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

411. 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.

412. It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Farrer & Co (2021) have provided the following spectrum of behaviour in their guidance 'Developing & Implementing a low-level concerns policy: A guide for organisations which work with children':

Developing and implementing a low-level concerns policy:
A guide for organisations which work with children

Appendix C

Diagram 1: Spectrum of behaviour

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; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Recording a concern

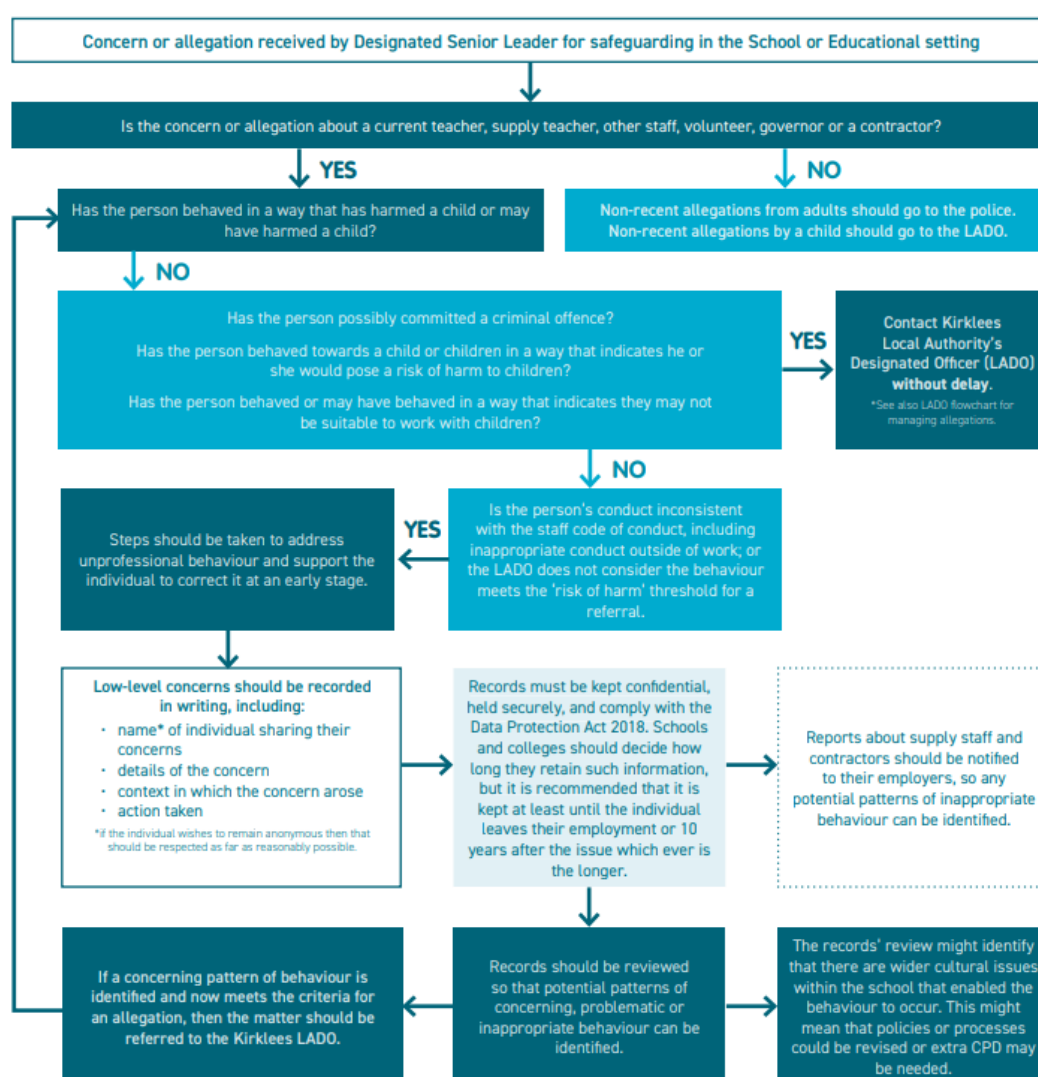
1. The staff member needing to record their concerns will speak to Karen Larsen / Andrew Taylor (DSLs)
2. Karen Larsen / Andrew Taylor will select the name of the person who is the subject of their concern. record a new incident on CPOMS StaffSafe.
3. The staff member reporting the concern must keep the information confidential and not share the concerns with other members of staff.

4. The member of staff will have further training sessions with a member of the leadership team and an action plan will be created. Further support and training will be identified as needed to ensure professional expectations have been fully understood.

Concerns will be stored in accordance with GDPR guidance on the CPOMS StaffSafe and will be kept confidential, held securely and will comply with the Data Protection Act 2018. These will be kept on record for the recommended time of ten years after the incident or until the individual leaves their employment (whichever is the longer).

Low-Level concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Kirklees Council have provided the following flow chart, which will be used to determine what happens next following the logging of a concern:



Role of the Advisory Committee

The Advisory Committee of our school will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities as advisory members,

including their statutory safeguarding duties. The Advisory Committee of our school will support the ethos and values of our school and will support the school in the monitoring and recording of Low-Level concerns. In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education 2024', the committee will challenge the school's Executive Headteacher and Head of School on the delivery of this policy and will monitor its effectiveness.

Members will review this policy regularly (every two years) and may amend and adopt it outside of this time frame in accordance with any new legislation or guidance or in response to any quality assurance recommendations pertaining to the delivery of this policy and the overall safeguarding arrangements made.

Recruitment

The arrangements for recruiting all staff, permanent and volunteers, to our school will follow Trafford's guidance for safer recruitment best practice in education settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks. We will apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement. We will be alert to the possibility that persons may seek to gain positions within our school so as to unduly influence our school's character and ethos. By adhering to safer recruitment best practice techniques and by ensuring that there is an ongoing culture of vigilance within our school and staff team to ensure Low-Level concerns are appropriately addressed.

Staff Training

Through INSET opportunities in school, we will ensure that our staff are fully aware of their own responsibilities with regards to raising Low-Level concerns about their colleagues. Regular training and discussions will be held about this, so that staff members are familiar with the process should they need to raise a concern.

The purpose of this system is to ensure that all staff maintain the attitude that transparency is important in order to safeguard our pupils at all times. Staff should also be aware that it is part of their professional responsibility to raise and record issues that need to be addressed, so that support and additional training can be put in place where needed. Rather than 'reporting' on each other, this system is instead intended to ensure Low-Level concerns are addressed rather than being left to escalate further.

Useful links:

- **Farrer & Co (September 2021), 'Developing and implementing a low-level concerns policy: A guide for organisations which work with children'**
<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf>
- [Keeping Children Safe in Education \(September 2024\)](#)
- **Trafford Strategic Safeguarding Partnership advice for 'Adults who work with children'**

<https://www.traffordsafeguardingpartnership.org.uk/safeguarding-children-and-young-people/Allegations-Against-Adults-Who-Work-With-Children/allegations-against-adults-who-work-with-children.aspx>

- NSPCC advice for 'Responding to low level concerns about adults working in education'

<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education>