



IAT Low Level Concerns Policy and Guidance 2024

Reviewed by	Carl Faulkner CEO
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This document must be read in conjunction with other Trust Policy documents, including our whistleblowing and allegation management procedures.

IAT Low Level Concerns Policy and Guidance 2024

Concerns regarding adult's behaviour may exist on a continuum from 'low-level' concerns which are concerns regarding adults that do NOT meet the threshold of harm through to allegations of harm that do meet the threshold. This does not mean that behaviours by adults towards children that cause any concern, are in any way insignificant or acceptable. However, clear evidence of harm and disclosure are often required to meet that harm threshold. It is therefore imperative that information regarding any level of concern that exists on this continuum is shared quickly and effectively.

It is also necessary that the same route of intervention is applied across the continuum and that **any** and **all** concerns are always shared directly to the Headteacher immediately. If concerns are regarding the Headteacher this should be shared directly to the chair of Governors/ (School staff) Trustees (if about the CEO)/ CEO (if about the Central Team), depending on your school/academy structure.

Head teachers manage school based staff.

The CEO manages Central Team staff.

Prevention of Low-Level Concerns/Creating a Safe Culture

As part of a whole school approach to safeguarding, Ironstone Academy Trust will ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this will encourage an open and transparent culture; enable our school to identify 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, and in accordance with the ethos and values of the institution.

A safe and effective response to concerns of any nature, demonstrates a culture of taking safeguarding seriously. It also empowers and encourages the workforce to continue sharing and seeking advice from the Headteacher or CEO across the continuum of concerns and thus hopefully leading to a reduction of serious incidents.

Describing Low-Level Concerns

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/online;

and

- does not meet the allegations threshold or is otherwise not considered 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;
- 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.

As stated, 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.

It is crucial that any such concerns, are shared responsibly and with the right person and recorded and dealt with appropriately, by the Headteacher or CEO. Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Sharing Low-Level Concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported directly to the Headteacher or CEO. Reports about supply staff and contractors should be notified to their employers, by the Headteacher or CEO, so any potential patterns of inappropriate behaviour can be identified.

It is critical that in our school, staff feel there is a safe environment where they are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards outlined in the Staff Behaviour Policy.

Recording Low-Level Concerns

All low-level concerns will be recorded in writing, following our school's recording policy and agreed system; using a secure area of OneDrive. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then this will be respected as far as reasonably possible.

These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information). Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred by the Headteacher or CEO to the LADO. Consideration will be given to whether there are wider cultural issues within the school/college that enabled the behaviour to occur and where appropriate policies will be revised, or extra training delivered to minimise the risk of it happening again. Our school will retain the information at least until the individual leaves their employment.

References

The school/college should only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or 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. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Responding to Low-Level Concerns

It is the responsibility of the Headteacher or CEO to fact find, following the reporting of a low-level concern. If the concern has been raised via a third party, the Headteacher or CEO will collect as much evidence as possible by speaking either directly to the person who raised the concern, (unless it has been raised anonymously) or to the individual involved and any witnesses. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for the decisions and action taken.

Learning from Low-Level Concerns

As stated, following any reports of low-level concerns our school will review any necessary changes to policy and practice to minimise the chance of a further concern being reported and ensure that member of staff who reported the concern has been fully supported and empowered to share future concerns. Any changes to policy or practice will be shared with all members of the workforce via either a team meeting or enhanced training.

This policy should be read in conjunction with:

Staff Behaviour Policy/Code of Conduct

Whistleblowing Policy

This policy template has been developed and supported by the following:

DFE: Keeping Children Safe in Education September 2024

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>