

# Go Fish Education Ltd

## Low Level Concern Policy

**If the child lives in Dorset, you should contact the Children's Advice and Duty Service on 01305 228558**

**If the child lives in Bournemouth, Christchurch & Poole you should contact the Multi Agency Safeguarding Hub (MASH) on 01202 735046**

**If the child lives in Hampshire, you should contact the LADO on 01962 876364**

**To do nothing is not an option!! Report concerns to Kerry Brown**

**This policy is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education (KCSiE)**

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 of KCSiE

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of Low-Level Concerns**

The term 'Low-Level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly 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  
Using inappropriate sexualised, intimidating or offensive language

### **Sharing Low-Level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Have clear policies and procedures
- Empowering everyone to share any low-level concerns

### **Empowering staff to self-refer**

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

### **Reporting a low level concern**

- Low level concerns about a member of staff should be reported to the Kerry Brown as per the safeguarding policy
- If the concern is about the DSL (Kerry Brown) this should be reported to the Deputy (Dylan Brown)
- Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.
- Staff should record the concern in writing stating:
  - Full name;
  - Child's current location and emotional and physical condition;
  - Nature of concern or details of disclosure with each time and location;
  - Whether the child needs immediate protection;
  - Details of the alleged perpetrator, if relevant;

### **Responding to low-level concerns**

If the concern is raised via a third party, the Kerry Brown will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

Kerry Brown will use the information collected to categorise the type of behaviour and determine any further action, in line with the Safeguarding Policy

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that we feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.
- Go Fish Education will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

## **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

### **Records will be:**

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **Reviewing a low level concern**

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 Kerry Brown will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

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If the concern relates volunteers, or any other concerns arise, school can contact the LADO for further advice.

## **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

