

Low Level Concerns Policy

Introduction

At St Martin's School, we take safeguarding very seriously. 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 school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

Professional curiosity

What is a low-level concern? 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 in the safeguarding policy. All staff are encouraged to have 'professional curiosity.' No matter how small the concern, 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 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. 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.

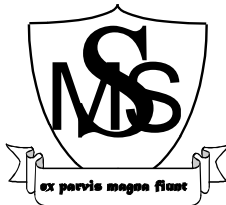
Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. All such concerns, including those that do not meet the harm threshold, 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 our school from potential false allegations or misunderstandings.

Inappropriate conduct

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. If you have a concern about a member of staff, you should inform the Headteacher (Gideon Zucker) or Deputy Head Teacher (Dan Guyster) about your concern. To report a concern, you should use the 'Safeguard My School' app or website in the same way that Safeguarding concerns are recorded – ticking the 'is there an allegation against a member of staff in this incident' box and ensuring the drop-down low-level concern has been selected.

Culture

As part of our whole school approach to safeguarding, we ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (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. This will encourage an open and transparent culture; enable us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of St Martin's School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.



GDPR

Low-Level Concerns (LLC) and follow-up information will be securely stored within St Martin's School's safeguarding systems, with access limited to the Safeguarding team. This will be stored in accordance with the school's GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Safeguarding Team, Headteacher or those aware in the senior leadership team. 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. Whenever staff leave St Martins, any record of low-level concerns that are stored about them, will be reviewed as to whether or not that information needs to be kept. Consideration will be given to: (a) 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 so as to justify keeping it, in line with normal safeguarding records practice; or (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, will be deleted accordingly.

Written by: Mr Gideon Zucker (Head Teacher and DSL) Ratified by: Governors
Policy date: September 2024 To be reviewed: September 2025