



Managing Low-Level Concerns in Relation to Staff Conduct PHS POLICY

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Policy Control/Monitoring

Approved by: (Position in Organisation)	
Date:	September 2024
Accountability: (Position in Organisation)	Designated Safeguarding Lead
Revision Cycle:	Annual
Brief details of amendments made	

Equality Impact Assessment

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They should:

- Make a written record of the information (where possible in the incident/s, persons present and what was said (see Appendix 1)
- Sign and date the written record
- Immediately report the matter in line with this policy

They should not:

- Investigate or ask leading questions if seeking clarification
- Make assumptions or offer alternative explanations
- Promise confidentiality but should instead give assurance that the

- 4.7 In some cases, staff may have concerns about someone closely associated with a member of staff (e.g. partner, member of the family or other household member) who may present a risk of harm to children for whom that individual is responsible. In these circumstances, such concerns should be reported in accordance with this policy.
- 4.8 There may be occasions where a member of staff feels it is necessary 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. There may also be situations where a member of staff feels it necessary to voluntarily share specific information for the purpose of transparency and openness. In these circumstances, such concerns should be reported in accordance with this policy.
- 4.9 It is recognised that staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation. All staff must remember that the welfare of

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procedures do not fully apply; for example, supply teachers or contracted staff provided by an employment agency or business.

- 4.11 However, in accordance with KCSIE 2023 the school will ensure concerns are dealt with properly and **under no circumstance** will a decision be made to cease using the contracted staff due to safeguarding concerns, without finding out the facts, investigating the concern and following usual procedures.
- 4.12 It is important that any concerns raised about agency/contracted staff are shared with their employer so that any potential patterns of inappropriate conduct can be identified.
- 4.13 For supply staff, it may be necessary to discuss with the supply agency (or agencies), whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst an investigation is carried out.
- 4.14 *Where an **allegation (meeting the harm threshold)** is made against contracted staff, the headteacher will immediately contact both the Local Authority Designated Officer (LADO) and the agency/business concerned. The school will continue to support any investigation that is required. Whilst agencies will need to be fully involved and co-operate with any enquiries from the LADO, police and/or children’s social care, the school may need to take the lead on an investigation. This is due to the fact that agencies won’t have direct access to children or other school staff, therefore may find it difficult to collate evidence as part of an investigation. The school may also be required to liaise with the LADO in relation to the referral process.*

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5 Timescales

5.1 It is important that concerns are shared in line with this policy as soon as

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5.5 Should it be considered necessary that a concern requires immediate attention, but is received outside normal school hours, the individual receiving the concern should determine whether it meets the harm threshold and if so social Care Emergency Duty Team or local police and inform the LADO at the first opportunity. If the concern is assessed as low level, the guidance in this policy should be followed.

6 Initial considerations

6.1 Once a concern has been raised with the Headteacher or Designated Safeguarding Lead (DSL), the procedures for dealing with concerns will be applied with common sense and judgement.

6.2 There may be circumstances where a concern is initially considered to not meet the harm threshold but after further investigation may then be considered to either meet the threshold or have the potential to. In these circumstances, or if in any doubt, advice from the LADO and Human Resources (HR) should be taken and at any point during an investigation the process followed can be enhanced and the relevant policy dealing with allegations that meet the harm threshold should be followed.

6.3 Where it is uncertain whether a concern meets the criteria for a referral (i.e. meets the harm threshold) the matter will be discussed first with the LADO.

7 Allegation/concerns that do not meet the harm threshold ‘low level concerns’

7.1 Where a concern is raised, or an allegation has been made but does not meet the harm threshold set out in paragraph 355 of KCSIE, it will be dealt with as a low-level concern as set out in this policy.

This policy follows the advice and guidance set out in KCSIE , Part four, Section Two: Concerns that do not meet the harm threshold paragraphs 423-445.

It is important to understand that a concern may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken. It may arise in the context of the member of staff and their life outside work or at home.

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Information sharing and the appropriate recording and handling of concerns are important to ensure potential patterns of concerning behaviour can be identified as soon as possible, and appropriate action taken swiftly in order to safeguard children.

4. Definitions

4.1 What is a low-level concern?

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the conduct towards a child does not meet the threshold set out in paragraph 426 of KCSIE. This procedure enables staff to share any concern no matter how small

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5. Principles

Sharing a low-level concern

- 5.1 It is **not necessary** for staff to be able to determine in each case whether their concern is a low-

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9.7 The headteacher/DSL/nominated deputy will update the individual in question and inform them of the action taken as above.

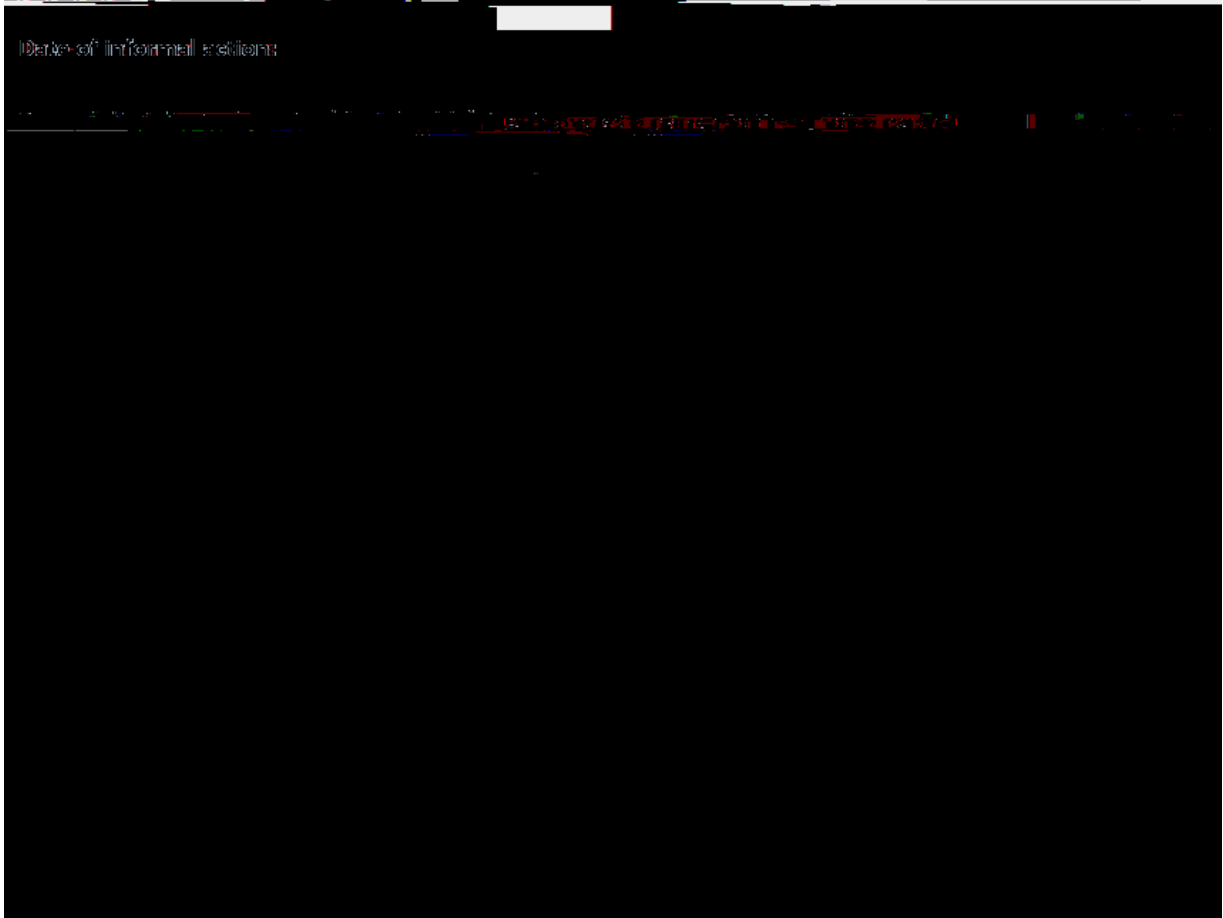
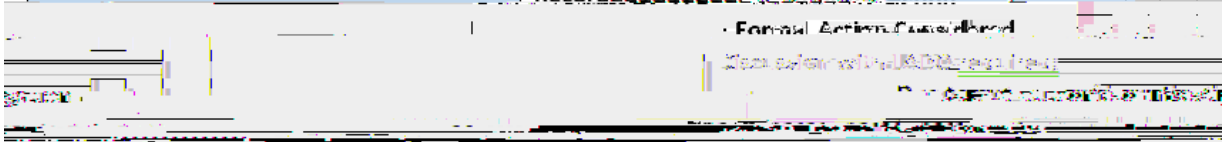
9.8

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Recommendation from investigation:	Behaviours consistent with policy - NFA
	Recorded as LLC - Informal Action



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