

1. Legal framework

1.1. This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE 'Keeping children safe in education'
- DfE 'Working Together to Safeguard Children'

1.2. This policy operates in conjunction with the following Trust and school policies:

- The CIT Trust wide safeguarding Statement
Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Positive Handling Policy
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy
- Data Protection Policy

2.

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- Ensuring that the Trust complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed at each school, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

3.2. The Trust Designated Safeguarding Lead is responsible for:

- Monitoring and reviewing this policy.
- Providing training on managing low level concerns to Headteachers and DSLs
- Providing advice and guidance to Headteachers and DSLs on the management of reported concerns as appropriate.
- Monitoring the application of this policy within each school.
- Conducting school audits on the reporting, recording and management of low-level concerns to ensure compliance with this policy.

3.3. The Headteacher is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout their school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff within their school have undertaken safeguarding training.
- Ensuring that all staff within their school have an ongoing awareness of low-level concerns and reporting procedures.

3.4. The DSL is responsible for:

- Being a point of contact for all staff when en-GB alv300510003p4(ei4f1 0 001(al)6(4(ac)140.

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closed door between the child and a school counsellor who has received all appropriate safety checks.

- 5.6. Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

Trust culture

- 5.7. The Trust understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.
- 5.8. The Trust will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere (ci)5(al)6()1 and 07/editi6 642.46 TmB317cf8are ar

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- 8.1. Where the Headteacher or DSL is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Headteacher will discuss the concern with the DSL and seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the Headteacher will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.
- 8.2. To evaluate a concern, the Headteacher and DSL will:
 - Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
 - Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
 - Determine whether the concern, when considered alongside any other low-level

- 9.3. Where the Headteacher or DSL determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:
- 9.4. The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
- Talk to the individual in a non-accusatory and sympathetic manner.
 - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
 - Clearly state what about their behaviour was inappropriate and problematic.
 - Discuss the reasons for the behaviour with the individual.
 - Inform the individual clearly what about their behaviour needs to change.
 - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
 - Allow the individual the opportunity to respond to the concern in their own words.
- 9.5. The DSL asks the individual to re-read the Staff Code of Conduct.
- 9.6. The DSL and the Headteacher will consider whether the individual should receive guidance, supervision or any further training.
- 9.7. Where considered appropriate in the circumstances, the Headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- 9.8. Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- 9.9. Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.
- 9.10. The Headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Records Management Policy and the Data Protection Policy. The Headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.
- 9.11. The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

Where the concern is serious

- 9.12. The Headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Headteacher will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

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Signature of DSL or deputy DSL	
Actions to be taken , e.g. no action, investigation, reclassification as allegation meeting the harms threshold.	