

Eastwood Park Academy Trust (EPAT)

EPAT

Believe Succeed Together

Low Level Concerns Policy

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1.0 Introduction

This policy should be read in conjunction with the Trust's **Safeguarding Policy, Staff Code of Conduct** and **Whistleblowing Policy**, to enable staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

This policy seeks to:

- Ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others - and the delineation of professional boundaries and reporting lines.
- Empower staff to share any low-level concerns with the Principal.
- Help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage.
- Identify concerning, problematic or inappropriate behaviour (including any patterns) that may need to be consulted upon or referred to the LADO.
- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised.
- Help identify any weaknesses in the Trust's safeguarding system or procedures.

2.0 Definition

A '**Low-Level Concern**' is one that is inconsistent with the Staff Code of Conduct Policy (specifically section 7.0 and 8.0) but is **not** considered serious enough to be referred to the LADO because it does not meet the harm threshold.

A '**high-Level Concern**' is one that meets the harm threshold i.e. where a member of staff has behaved in such a way that has harmed a child, or may have harmed a child and/or possibly committed a criminal offence against or related to a child: and/or behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside school posing a transferable risk to children).

3.0 Managing Low Level Concerns

3.1 Reporting

All concerns must be reported to the DSL. The record should include:

- Details of the concern.
- The context in which the concern arose.
- Action taken.

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Where the concern is provided verbally, the DSL should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above.

3.2 Determining the Level of Concern

The DSL will, in the first instance, collect information to help determine the level of concern. The circumstances in which a low-level concern may be reclassified are where:

- The threshold is met for a higher-level concern.
- There is a pattern of low-level concerns which collectively amount to a higher-level concern.
- There is other information which, when taken into account, leads to a higher-level concern.

The DSL will discuss the concern(s) with the Principal. If the concern is deemed to be 'high-level' it will be referred to the LADO. If the concern is deemed to be 'low-level', the Principal, as the ultimate decision-maker, will determine an appropriate and proportionate response.

Most low-level concerns, by their very nature, are likely to be minor and can be dealt with by means of advice, guidance, support and training.

In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a low-level concern will include:

- Being clear with the individual as to why their behaviour is concerning, problematic or inappropriate.
- What change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that.
- Being clear about the consequences, if they fail to reach the required standard or repeat the behaviour in question.

Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may also be required.

Some concerns may trigger the Trust's Disciplinary Misconduct Policy, which will be followed, where appropriate.

4.0 Related Policies

Staff Disciplinary (Misconduct) Policy
Harmful Sexual Behaviour Policy
Safeguarding Policy
Staff Code of Conduct Policy
Whistleblowing Policy