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drb Ignite Multi Academy Trust

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# **Safeguarding Low Level Concerns Policy**

## Introduction

The Trust and its schools have a range of duties in relation to safeguarding pupils and take these responsibilities very seriously through an embedded *culture of safeguarding*. The statutory guidance *Keeping Children Safe in Education* provides an overview of duties with regard to the reporting of *low-level safeguarding concerns*. This Policy sets out the Trust's approach to the reporting of low-level concerns.

## Alignment with Trust key principles

Our Trust has four key operating principles, all of which relate directly or indirectly to this policy.

- Outstanding pupil experience
- Excellence in education
- Impactful teaching
- Effective partnerships

## Purpose of the policy

The Trust believes every child attending a Trust school should be able to learn in an enjoyable and safe environment and be protected from all forms of abuse. This is the responsibility of **everyone** involved with the Trust and its schools.

The Trust recognises that a critical step to safeguarding is to ensure that all those who work with children behave appropriately and that any concerns about an adult's behaviour are identified early and are managed promptly and appropriately.

The purpose of the Trust's *Low-Level Concerns Policy* is to:

- support the Trust's *culture of safeguarding* by enabling staff to feel confident to report any concern, no matter **how small** that concern is.
- ensure the welfare and interests of the child are kept **paramount** in all circumstances regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation and socio-economic background.
- ensure all allegations, suspicions of harm and/or abuse and related concerns, are **taken seriously** and responded to **swiftly**, fairly and appropriately.
- support everyone to **work in partnership** to promote the welfare, health, safety and development of a child.

The policy focuses on low-level concerns regarding adults' behaviour towards children by ensuring the Trust is compliant with KCSiE by:

- supporting and promoting a culture of openness
- supporting staff to be clear about and confident to distinguish between expected, concerning and problematic adult behaviour
- expecting staff to share any low-level concern with the school's designated safeguarding lead or headteacher
- identifying concerning, problematic or inappropriate behaviour
- addressing unprofessional behaviour at an early stage
- providing responsive, sensitive and proportionate handling of such concerns
- helping to identify weaknesses in the Trust/school's safeguarding systems

**For note:**

This policy applies to all trustees, leaders, staff, visitors and volunteers.

This policy should be read alongside the following Trust policies:

- Safeguarding and Child Protection Policy and Procedures (Birmingham and Dudley versions)
- Staff Code of Conduct
- Trustee Code of Conduct
- Whistleblowing Policy
- No Platform Policy

**Concerns that are NOT covered by this Policy**

**Allegations**

An *allegation* means that it is alleged that a person who works with children has:

- behaved in a way that has harmed or may have harmed a child
- possibly committed a criminal offence against a child
- behaved towards a child in a way that indicates they may pose a risk of harm to that child
- behaved in a way in their personal life that raises safeguarding concerns.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

**For note:**

These concerns do not have to directly relate to a child, but could for example, include:

- an arrest for possession of a weapon
- having, as a parent or carer, become subject to public protection procedures

## Safeguarding concerns

- Clear concerns about a child's safety or welfare
- Concerns regarding child-on-child abuse
- Platforming behaviours

To report a concern of child-on-child, platforming or the welfare of a child refer directly to the Trust's *Child Protection and Safeguarding Policy* and procedures. All Trust safeguarding policies and associated information can be found on the Trust website and individual school websites.

## Concerns that ARE covered by this Policy

### Low-level concerns

A low-level concern about an adult's behaviour towards a child that does not meet the allegation and safeguarding thresholds set out above, or is not otherwise serious enough to consider a further referral

A low-level concern is any concern, no matter how small, and even if no more than a ***nagging doubt*** or a ***sense of unease*** that an adult may have acted in a manner which:

- is not consistent with the Trust's *Child Protection and Safeguarding Policy* and procedures
- relates to conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children

## What to do if there is a low-level concern

All low-level concerns should be referred to the Trust/school designated safeguarding lead (DSL) or headteacher.

It is important:

- to share concerns with the DSL asap and within 24 hours of becoming aware of it
- in the absence of the DSL, to inform the headteacher
- if behaviour relates to the DSL, to share the concern with the headteacher
- if behaviour relates to the headteacher, to share the concern with the Trust's Executive Director for School Improvement
- if behaviour relates to an executive team member, to share the concern with the Trust CEO

- if behaviour relates to the CEO. to share the concern with the Trust Chair
- if behaviour relates to a trustee, to share the concern with the Trustee Safeguarding Lead and Trust Chair.

## **Trust procedure for managing a low-level concern**

### **Step 1 - Initial concern raised**

In the first instance, staff should report verbally to their DSL or to their headteacher and a written summary of concern will be completed using the Trust's *Low-Level Concerns Reporting Template*.

#### **For note:**

- Sound professional judgment of DSL should be used in determining what information is necessary to record for safeguarding purposes
- The record should include brief context, concise details, and relevant incidents
- The record should be signed, timed and dated.

### **Step 2 - Response by DSL and/or headteacher**

- The DSL/headteacher should allow enough time to speak to the person who is raising the concern and ensure their concern is reported accurately
- The DSL/headteacher should review the information and decide whether the behaviour is:
  - entirely consistent with Trust's *Child Protection and Safeguarding Policy and Procedures*
  - constitutes a low-level concern
  - serious enough to consider a further referral/escalation
  - serious enough to be reclassified as an allegation and referred to the Trust, LADO or any other statutory agencies having considered any other previous low-level concerns about this individual.

If the DSL/headteacher is in any doubt of points above, they should seek immediate advice from the Trust. The DSL/headteacher must use the recording template to make records of:

- all internal conversations
- all external conversations
- their determination
- the rationale for their decision
- any action taken

### Step 3 – Decision making and next steps

If the information shared meets the Trust's expectations and is compliant with the Trust's *Child Protection and Safeguarding Policy and Procedures*:

- DSL to inform the individual concerned what was shared about their behaviour and give them an opportunity to respond
- DSL to speak to the person who shared the low-level concern, providing feedback about how and why the behaviour is consistent with the Trust's Safeguarding Policy and Procedure and KCSiE
- Trust/school to consider if a review of the Trust's safeguarding procedures is necessary e.g. are policies and procedures clear? Has training been unsatisfactory? Is the Trust's *Low-Level Concern Policy* clear enough?
- Trust/school to consider further staff training/support for the *Low-Level Concern Policy* e.g. if the same individual reports similar low-level concerns that are found not to breach Trust Policy

If the information shared **does not meet** the Trust's expectations and is in breach of the Trust's *Child Protection and Safeguarding policies and procedures* regarding a low-level concern, the DSL/headteacher/Trust will:

- take immediate action to discuss with the individual concerned and give them opportunity to respond
- recognise that a sensitive and proportionate approach is essential
- maintain confidence that concerns will be handled promptly and effectively, whilst protecting staff from potential false or malicious allegations
- maintain that any investigation is on a *need to know* basis e.g. the concern may be dealt with by management guidance and/or training and not give rise to further action
- ensure a positive and supportive conversation with the individual to enable them to meet future expectations noting that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening
- assess whether further evidence gained raises the level of concern, if so, the DSL should seek guidance from their headteacher, the Trust and/or LADO.
- ensure that if referring to LADO, the headteacher/Trust is always informed.

### Previous low-level concern

If an individual has had a previous low-level concern raised against them, the DSL must inform their headteacher and the Trust of this further concern. The information available will be reviewed and a decision may be made to reclassify the concern as a more serious concern or allegation.

## Monitoring and review

This policy will be monitored as part of the Trust’s annual internal safeguarding review or as required by legislature changes to KCSiE and associated documents.

## Change management

<b>Monitoring and review:</b>	CEO Trust Board Trust Improvement Board
<b>Links:</b>	Safeguarding and Child Protection Policy Staff Code of Conduct Trustee Code of Conduct Risk and Management Whistleblowing No Platform Policy
<b>Staff responsible:</b>	CEO, Executive Director Governance and Strategy, Headteachers
<b>Committee responsible:</b>	Trust Improvement Board Achievement, Support and Scrutiny Sub-Committee
<b>Date:</b>	September 2022
<b>Next review:</b>	September 2023
<b>Sign off by Chair of Trust:</b>	 Date: September 2022

## Change Management

Issue No.:	Change date:	Change description:
1.0	Oct 21	Initial release
2.0	Sep 22	Updated for KCSiE 2022