



TOWN CLOSE SCHOOL

NORWICH'S FINEST PREP SCHOOL • FOR GIRLS & BOYS • 3-13 YEARS

LOW LEVEL CONCERNS ABOUT STAFF BEHAVIOUR POLICY v 1.0

At Town Close School, we recognise the possibility that adults working in the school, including governors, volunteers, supply teachers, agency staff and contractors may harm children. Any concerns about the conduct of other adults in the school should be taken to the Headmaster without delay; any concerns about the Headmaster should go to the Chair of Governors who can be contacted by email (see the contact list on page 3 of the Safeguarding and Child Protection policy).

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Headmaster has to decide whether the concern is an allegation or 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 for referral to the Local Authority Designated Officer (LADO) (see below).

Allegations

It is an allegation if the person* has:

- behaved in 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 (also includes behaviour outside the school).

(*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'. They will be able to advise whether or not the incident meets the threshold for a referral to LADO and will be able to guide schools on the process to follow.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours 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.

This information is made clear in our School Code of Conduct, including the importance of sharing such concerns.

If the concern has been raised via a third party, the Headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident 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.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies

or processes could be revised or extra training delivered to minimise the risk of it happening again.

The School encourages everyone affected by its operation to report any concern, even if no more than one which causes a sense of unease or a "nagging doubt", they may have that a member of staff, supply staff, volunteer or contractor working in or on behalf of the School may have acted in a way that is inconsistent with expected professional standards and/or the staff Code of Conduct to the Head, so that the appropriate action can be taken.

All members of staff, supply staff, volunteers and contractors are themselves encouraged 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 may fall below the expected standards.

The purpose of the School's policy with regards to low level concerns is to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

The Head will usually share the concern with the DSL (or deputy) and they will address the concern in a proportionate manner. They will consider whether the matter is a low level concern - one which does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Designated Officer(s), or whether it is sufficiently serious to meet the harms threshold.

The School considers that all concerns about members of staff, supply staff, volunteers and contractors should be shared responsibly with the right person, that they should be recorded and that they should be dealt with in line with The Town Close School Safeguarding and Child Protection Policy.

The information collected as part of any such investigation will help to categorise the type of behaviour and determine what further action may need to be taken. The detail of the concern should be recorded along with the context in which it arose, the rationale for the decisions made and action taken. This information should be kept confidential and stored securely. The name of individuals sharing concerns should also be noted, but a wish to remain anonymous should be respected as far as reasonably possible.

Records of low level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, the School will decide on a course of action to take which might include reference to its internal disciplinary procedures or a referral to the Designated Officer(s) if the harms threshold is met. The School will also consider whether there are any wider cultural issues in School that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence

The Head will consider whether reports about supply staff and contractors should be

notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Low level concerns should not be included in staff, supply staff, volunteer and contractor references unless they relate to issues which would normally be included e.g. misconduct or poor performance. Those that relate exclusively to safeguarding issues should not be referred to in a reference unless they meet the threshold for referral to the County Designated Officer(s) (LADO) and are found to be substantiated.

Last reviewed January 2022

Next review January 2023