

Low level Concerns Safeguarding and Child Protection Policy  
for Grateley House School



Policy Review Date  
Date of Next Review  
Reviewed by  
Name of Designated  
Safeguarding Team

September 2022  
September 2023  
Dan Tresman  
Eva Pereira (Interim Principal,  
and DDSL)  
Jean North (DSL)  
George Fox (Education)  
Naomi Whimpenny DDSL &  
BSL  
Joshua Hand Acting HoC and  
DSL (Stratford Lodge)  
Sarah Henstridge (DDSL  
Stratford Lodge)

This policy aims to identify what low level concerns are and to make clear to Grateley House School (GHS) staff what process to follow in regard to the recording of any low-level concerns about staff and adults working with children at GHS.

This policy should be read in conjunction with:

- The Cambian Child Protection and Safeguarding Policy – children’s services: Grateley House School policy which is displayed on the school website
- The Localised Safeguarding Procedure for Grateley House School
- The Whistleblowing Policy
- [Keeping Children Safe in Education. Statutory Guidance for schools and colleges](#) (This policy relates to KCSiE Part Four.)
- [Working Together To Safeguard Children 2018](#)
- Section 175 of the education act 2002; the Education (Independent School Standards) Regulations 2014; the Non-Maintained Special Schools (England) Regulations
- Children Act 2004 & 1989

## Policy Statement

At Grateley House School (GHS) we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. A child is defined as anyone under the age of 18 years. GHS cohort extends to students who are 19 years of age and staff should be aware that this policy also applies to any low level concerns regarding any vulnerable adult at GHS.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We maintain an attitude of "it could happen here" where safeguarding is concerned.

The purpose of this policy is to provide staff and volunteers with the framework they need in order to keep children safe and secure in our school in regard to any low level concerns among staff and to inform parents/guardians how we will safeguard their children whilst they are in our care.

### 1. Introduction

Safeguarding is a priority at Grateley House School. The school ensures that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low level concerns they may have.

### 2. Summary

It may be possible that a member of staff acts in a way that although it does not qualify as an action that could cause risk to children, it is however inappropriate. A member of staff who has a concern about another member of staff should inform the Principal about their concern by inputting a cause for concern onto the staff section of Behaviour Watch. If the Principal is not available, the cause for concern should be directed to Jarlath O'Brien the Regional Educational Lead.

### 3. Low Level Concerns in Keeping Children Safe in Education September 2022 (KCSiE)

Grateley House School ensures that the policy and conduct of GHS staff complies with that set out in KCSiE 2022 Part Four. This states the following:

423. As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about **all** adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

424. Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should

- encourage an open and transparent culture;
- enable schools and colleges to identify concerning, problematic or inappropriate behaviour early;
- minimise the risk of abuse;
- and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

## **What is a 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 set out at paragraph 425 of KCSiE 2022:

A low level concern may be defined as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the GHS staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

**Examples of such behaviour could 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.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of GHS from potential false allegations or misunderstandings.

## **4. Clarity around Allegation vs Low Level Concern vs Appropriate Conduct**

It is important that staff are clear of the difference between an allegation against a member of staff or adult and a low level concern. Staff should also be aware of what constitutes appropriate conduct.

### **Allegation:**

An allegation is made when that the behaviour of an adult has:

- Has harmed a child or may cause harm to a child
- An adult has possibly committed a criminal offence against a child
- An adult behaves in such a way that it suggests they may pose a risk of harm towards children

### **Low Level concern:**

This relates to any concern no matter how small – even if it is just a nagging doubt – that a staff member may have acted in a manner which:

- Is not consistent with Grateley House School's code of conduct and/or

- Has behaved in a way outside of school, even if not linked to a particular act or omission, that has caused a sense of unease about the adult's suitability to work with children.

#### **Appropriate conduct:**

This is conduct which is wholly in keeping with the Code of Conduct for Grateley House Staff booklet, the Cambian Child Protection and Safeguarding Policy for Grateley House School and the law.

#### **5. Storing and use of Low Level Concerns**

Concerns and information will be stored securely within the schools safeguarding system on Behaviour Watch. The Principal has access to all staff concerns. If appropriate they will share concerns with the DSL team.

Concerns will be stored in accordance with the school's GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Principal or those aware in the senior leadership team.

Low Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Grateley House School, any record of low level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

Where further advice or guidance is deemed necessary regarding any low level concern about a member of staff, the Principal will share the concern with the Regional Education Lead, Jarlath O'Brien and the HR partners of the Cambian Group.

This policy is due for review in September 2023

## Annex A

### Low Level Concern Flow Chart

