



KING'S LEADERSHIP  
ACADEMY BOLTON

SCHOOLS OF CHARACTER  
MAKING GREAT LEADERS

# LOW LEVEL SAFEGUARDING CONCERNS POLICY



GREAT SCHOOLS  
TRUST

## Document Control

<b>This document has been approved for use within</b>	All GST Secondary Schools
<b>This document has been approved by On</b>	Trust Board
	20.10.2022
<b>Date effective from</b>	21.10.2022
<b>Date of next review</b>	September 2023
<b>Review period</b>	Annual
<b>Status</b>	Active
<b>Owner</b>	Director of Education
<b>Version</b>	1.0

**Kings Leadership Academy Bolton**  
Low Level Safeguarding Concerns Policy

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## 1. Introduction

- 1.1. The Great Schools Trust (the Trust) takes the safeguarding of its pupils very seriously. We recognise that it is extremely important that any safeguarding concerns or allegations made against a member of staff, supply staff, contractors or volunteers is managed quickly and effectively. It is also important that low level safeguarding concerns are recognised and reported so behaviours can be appropriately managed.
- 1.2. This policy sets out how the trust will manage low-level safeguarding concerns and allegations made about a member of staff, supply staff, contractors or volunteers at our academy. It meets the requirements of the Department for Education statutory guidance for managing allegations set out in Part 4 of Keeping Children Safe in Education 2022.

## 2. Managing low level concerns

- 2.1 This policy will be followed when dealing with low level concerns raised in relation to members of staff, including supply staff, contractors or volunteers. It should be alongside the trusts complaints procedure, child protection and safeguarding policy, code of conduct and disciplinary procedure.
- 2.2 The Great Schools Trust promotes a culture in which all concerns about all adults working in or on behalf of the trust (including supply teachers, contractors and volunteers) are addressed appropriately.
- 2.3 This policy is designed to:
  - promote and support a culture of openness and trust where staff are clear about the behaviours expected of themselves and their colleagues
  - ensure staff are comfortable to raise low-level concerns; and
  - provide for efficient and proportionate handling of those concerns

## 3. Recognising low level concerns

- 3.1 This policy will be used to manage **'low-level' concerns**, defined in Part 4 of Keeping Children Safe in Education 2022 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 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 Local Authority Designated Officer (LADO).
- 3.2 Examples of such behaviour could include, but is 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

## **4. Sharing low level concerns**

- 4.1 For our culture of openness and trust to prevail, all staff should share any low-level concerns they have. Serious Case Reviews and Safeguarding Practice Reviews have often evidenced how low-level concerns felt and/or expressed by staff relating to individuals who were later found to have sexually abused children at a school were not recorded. When they are not recorded, they cannot be reviewed or studied for patterns of behaviour.
- 4.2 To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that staff understand their role in identifying and reporting low level concerns.
- 4.3 All staff are encouraged to immediately report low level safeguarding concerns so that the identified behaviours can be investigated and managed appropriately.
- 4.4 All low-level concerns in relation to staff, supply staff, contractors or volunteers should be reported immediately to the principal. Concerns about the principal should be reported to the LADO and chair of Local Academy Council (LAC), concerns about a member of trust staff should be reported to the CEO and concerns about the CEO should be reported to the Chair of Trustees.
- 4.5 The procedure for reporting low level concerns is consistent with that for reporting allegations of abuse made by staff set out in the safeguarding and child protection policy. All low-level concerns should be reported using the form in Appendix 1 or by using the KLAB hub 'Reporting a concern about an adult' tab. The member of staff reporting the low-level concern should record their concern in writing as outlined in section 6 of this policy.
- 4.6 Staff do not need to determine whether their concern meets the threshold for harm or is a low-level concern. The principal will make this determination once the staff member has reported the issue.

## **5. Responding to low-level concerns**

- 5.1 The principal or Chair of Governors (as appropriate) will review the concern to confirm that it is not a more serious issue that should be dealt with under the safeguarding and child protection policy. An issue reported as a low-level concern would be dealt under the safeguarding and child protection policy where it meets the threshold or there is a pattern of low-level concerns expressed about the individual or wider staff practices generally. If necessary, the principal or Chair of Governors will discuss the concern with the LADO to determine whether it should be dealt with under the safeguarding and child protection policy.
- 5.2 The principal/head of school or Chair of Governors/Trustees (as appropriate) will discuss the concern with the individual who raised it and will investigate it as appropriate.
- 5.3 Most low-level concerns are likely to be minor and can be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the trust code of conduct and disciplinary procedure.
- 5.4 If the concern has been raised via a third party, the principal/head of school or Chair of Governors/ (as appropriate) will collect evidence by speaking directly to the person who raised the concern (unless it has been raised anonymously), the individual involved and any witnesses.

- 5.5 Where a low-level concern is raised about a member of supply staff or a contractor, the concern will be shared with the supply agency so they can take appropriate steps in accordance with their own policies and statutory guidance.

## **6. Recording low-level concerns**

- 6.1 All low-level concerns will be recorded in writing using the Safeguarding Concerns Form – Allegations Against Staff (appendix 1) or using the KLAB hub ‘Reporting a concern about an adult’ tab which will include details of the concern, the context and action taken. The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.
- 6.2 The principal will log all low-level concerns reports using the trust ‘allegations against staff log’
- 6.3 Records of low-level concerns will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. If patterns are identified, the trust will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in the safeguarding and child protection policy.

The written record of the low-level concern will be kept at least until the person leaves our trust.

## **7. References**

- 7.1 Low level safeguarding concerns will not be included in references except where they have met the threshold for referral to the LADO and found to be substantiated, in which case they should be referred to in references.

## **Who is responsible for this policy?**

The Trust has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework or Trust framework. The Trust has delegated day-to-day responsibility for operating the policy to the CEO, the Director of Education and the principal/head of school of each secondary school.

The Local Academy Council and Senior Leadership Team at each trust secondary school has a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

## **Equality Impact Assessment**

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

## **Equalities Statement**

Under the public sector equality duty (PSED), all schools/academies must have due regard to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Equality Act 2010; to advance equality of opportunity between those who share a relevant protected characteristic and those who do not share it

and to foster good relations across all protected characteristics. This means academies must take into account equality considerations when policies are being developed, adopted and implemented.

## **Race Disparity Audit**

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

## **Monitoring, Evaluation and Review**

The policy will be promoted and implemented throughout all Trust secondary schools. The Trust will monitor the operation and effectiveness of arrangements referred to in this policy at each Trust secondary school.

The Trust will review this policy annually or in light of any changes in legislation/law.

## **Linked Policies**

- Safeguarding and Child Protection Policy
- Data Protection and Privacy Policy
- Disciplinary Policy
- Complaints Policy
- Code of Conduct

## **Other Related Documents**

This policy should be a working document that is fit for purpose. It represents the school ethos, enables consistency and quality across the school. It is also related to the following legislation:

- Education Act 1996
- Equality Act 2010
- Data Protection Act 2018
- General Data Protection Regulations

**In addition, the following documentation is also related to this policy:**

- Information Commissioner for advice on the Data Protection Act (DfE)
- Equality Act 2010: Advice for Schools (DfE)
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE)
- Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

## Appendix 1: Safeguarding concerns form – allegations against staff



### Safeguarding Concerns Form – Allegations Against Staff

CONFIDENTIAL

To be completed following the reporting of a safeguarding concern relating to a staff member or volunteer within the school. This may relate to a specific incident or may relate to an individual's general behaviour with or around pupils.

This form can be completed collaboratively with the principal, or the staff member may wish to complete the form themselves and return via secure email.

Where the concern relates to the principal the faculty for education HR team, or a senior member of the education team will complete the form with input from the staff member raising the concern.

#### DETAILS OF THE PERSON TO WHOM THE CONCERN RELATES

Name of staff member/volunteer	
Job title of staff member/volunteer	
Establishment of the staff member/volunteer	

#### DETAILS OF THE PERSON RAISING THE CONCERN (Add n/a if the concern has not been reported by a staff member)

Name	
Job title	
Establishment	
Date concern raised	
Type of concern (tick)	Allegation does not meet harm threshold (low level) <input type="checkbox"/> Allegation that may meet harm threshold <input type="checkbox"/>

#### DETAILS OF THE PERSON WHO HAS RECEIVED THE CONCERN

Name	
Job title	
Establishment	
Date concern received	

What is the nature of the allegation/concern?



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**If the allegation/concern relates to a specific incident include the following details**

<b>Date of incident</b>	
<b>Time of incident</b>	
<b>Location of incident</b>	
<b>Were there any other witnesses? If so, include names</b>	

<b>Has the staff member reporting the concerns had any previous concerns regarding this staff member/volunteer, or have concerns been raised previously?</b>	YES/NO
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**If YES, please add further detail below**

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To be completed by the principal/faculty for education team HR team /member of GST faculty for education team

<b>Is the allegation/concern likely to meet the harms threshold?</b>	YES/NO
<b>Rationale for reaching this decision</b>	

If **YES**, complete the **Safeguarding Risk Assessment – Allegations against staff** form to assess the level of risk and follow the steps outlined in the **Safeguarding Allegations Flowchart**.

If **NO**, complete the 'Agreed Actions' section below and follow the steps outlined in the **Safeguarding Allegations Flowchart**.

**AGREED ACTIONS**

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, discussion with the employee regarding concerns, review of policies or processes, peer support and monitoring of future behaviour.

<b>Action</b>	<b>Desired outcome</b>	<b>Timescale</b>	<b>Responsible Officer</b>

## Appendix 2: Safeguarding risk assessment form – allegations against staff



### Safeguarding Risk Assessment Form – Allegations Against Staff

CONFIDENTIAL

To be completed by the principal (or member of the GST central HR Team or senior member of the GST faculty for education team if it relates to the principal) if an allegation/concern may meet the harms threshold.

The purpose of the safeguarding risk assessment is to identify:

- If there is any risk to children, young people or adults with whom the employee has contact with, in a position of trust
- Whether the allegation/concern meets the harms threshold
- How any risk identified should be best managed
- Whether the employee is safe to continue in their role
- Any future implications should the employee continue in their role

#### BACKGROUND

Name of staff member/volunteer	
Job title of staff member/volunteer	
Establishment	
Date DBS checked	
Outcome of DBS check	

Are there any children present in the household of the employee?	YES/NO/UNKNOWN
If YES, please provide gender and age details	
Gender	Age

<b>What is the nature of the allegation/concern?</b> <i>Refer to the Safeguarding Concerns – Allegations against staff form</i>

<b>If the allegation/concern relates to a specific incident include the following details</b> <i>Refer to the Safeguarding Concerns – Allegations against staff form if this has been completed</i>	
<b>Date of incident</b>	
<b>Time of incident</b>	
<b>Location of incident</b>	
<b>Were there any other witnesses? If so, include names</b>	

**RISK ASSESSMENT FACTORS**

On the basis of the evidence available, professional judgement and experience, the level of risk should be assessed as follows for the appropriate risk assessment factors below:

- **Low risk (L)**
- **Moderate risk (M)**
- **High risk (H)**
- **Severe risk (S)**

<b>Risk Assessment Factor:</b>	<b>Risk L/M/H/S</b>
<b>What is the specific allegation/offences?</b> <i>Assess the risk based on the gravity of the allegations or offence</i>	
<b>Is the matter being dealt with by another professional agency e.g., Police or Local Authority Safeguarding Officer?</b>	This question does not need to be rated.
<b>If the matter is currently being dealt with by another agency, what is the current position of the investigation or intervention?</b>	This question does not need to be rated.
<b>How severe is the harm (threatened or inflicted) and are there any children and/or other vulnerable adults involved?</b> <i>Assess severity of harm threatened or inflicted</i>	
<b>Is there evidence to suggest that the harm is likely to continue or escalate?</b> <i>Assess the risk based on the likelihood of the harm continuing or escalating</i>	
<b>Is there evidence to suggest that the harm was premeditated?</b> <i>Assess the likelihood of the harm involving premeditation</i>	
<b>Is there evidence to suggest that the harm was accompanied by sustained threats or coercion?</b> <i>Assess the likelihood of the harm involving threats or coercion</i>	
<b>Is there a pattern of history for this type of behaviour?</b>	

<i>Assess the level of risk based on previous behaviour, frequency and severity</i>	
<b>What is the risk of harm posed to other children or adults?</b>	
<i>What is the likelihood of harm to the child or adults?</i>	
<b>Have there been any previous concerns or complaints?</b>	
<i>Assess the level of risk based on previous history, frequency and seriousness of issues</i>	
<b>What has been the impact on the employee's health and wellbeing?</b>	
<i>What is the level of risk based on the employee's current health</i>	
<b>Is the employee receiving any medical support? If not, is this intended?</b>	
<i>Assess the level of risk incurred from medication or existing treatment plan</i>	

**RISK ASSESSMENT SUMMARY**

Overall assessment of risks identified, including the risk to others:

<b>Views and recommendations of professional agency e.g., Police/Local Authority or Safeguarding Officer</b>
<b>Views and recommendations of Risk Assessor</b>
<b>Views of Individual (if appropriate)</b>

On the basis of the evidence available, professional judgement and experience, the level of overall risk should be assessed as follows for the appropriate risk assessment factors below:

- Low risk (L):** No safeguarding action is required and/or safeguarding issues have been addressed
- Moderate risk (M):** Safeguarding protection plan is required to manage the risk and/or remains in place in this area/overall
- High risk (H):** Safeguarding Protection Plan requires implementation. Legal action is being taken. The behaviour is persistent and/or deliberate
- Severe risk (S):** Life may be in danger, risk of major injury or serious physical or mental ill harm. The incidents are increasing in frequency and/or severity.

<b>Overall Risk</b>
<b>Low/Moderate/High/Severe</b>

## AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, supervision, peer support alternative duties and access to occupational health services. In some circumstances suspension may be required to manage risk.

Action	Desired outcome	Timescale	Responsible Officer

<b>Risk Assessor name</b>	
<b>Risk Assessor signature</b>	
<b>Risk Assessor job title</b>	
<b>Date of Risk Assessment</b>	
<b>Date of Review</b>	

## Summary of Changes in this Version

Page Number	Paragraph Number	Information
		New policy

