



Low-Level Concerns Policy

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Policy history:

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Linked policies and procedures:

| Policy Name |
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| Child Protection and Safeguarding Policy |
| Confidentiality Reporting Policy |
| Safer Recruitment Policy |

1. Philosophy

At St Paul's Catholic School, we take safeguarding very seriously. This includes ensuring that staff and volunteers are aware of concerns that impact on children. We are committed to promoting the welfare of every member of the school community, ensuring that they are not only safe but also feel safe. We strive to provide an environment that children, staff and parents/carers are able to talk about any safeguarding concerns and feel assured we will listen to their concerns.

2. Low Level Concerns - Children

A low level concern is not insignificant, but is one that does not meet the threshold for referral (<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-harm>). It includes concerns such as:

- Bruises which are not concerning- such as knees
- Child using inappropriate language
- One off incident of a child being shouted at by parent
- Child having grubby clothes
- Child who is tired due to late night
- Child being hungry

These concerns would commonly not have indicated any direct harm to a child but may over time indicate a pattern of behaviour which becomes a concern and warrants a consultation or referral to MASH.

Concerns that are raised about children may be significant concerns or low-level concerns. A member of staff who has a concern about a child (or is informed by a pupil, parent, other staff member or another agency) should record this information and inform the Designated Safeguarding Lead (DSL) immediately. The DSL can help support staff to identify if it is a significant concern or a low level concern. 87% of all referrals to MASH are low level concerns which have built to a level where it has become a concern that needs further investigation.

All low-level concerns should be recorded on CPOMS. The DSL and safeguarding team will provide CPOMS training annually to support the safe recording of information. The DSL and safeguarding team will regularly review low level concerns and look for any patterns emerging in individual children or groups of children.

Through regular training, staff will develop the confidence to understand the importance of patterns building up over a period of time. The DSL will also regularly check records to identify any patterns or trends or escalating concerns which may need further action to be taken. If the DSL is unsure, a consultation with the MASH team should take place and a record of all consultations kept.

3. Storage and use of Low-Level Concerns and follow-up information – Children and staff

Low-Level Concerns about children and follow up information will be stored securely within the school with access only by the DSL and Deputy DSL. This information is used to help build up a picture over time.

Low-Level concerns regarding staff are securely kept centrally and a referral is made to the LADO by the Headteacher or Business Manager (Deputy DSL).

4. Definition of low-level concerns - Staff

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- a) Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- b) Does not meet the allegations threshold (<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-harm>) or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority at the time

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Misuse of social media
- Dressing inappropriately
- Engaging in rough play
- 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
- Physical contact with a child
- Humiliating pupils or use of banter or sarcasm
- Behaviour that meets the harm criteria (<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-harm>).

The behaviour described below may have harmed a child and needs a referral to the LADO within 24 hours. The LADO will make decisions on the investigation and how to proceed. The list is not exhaustive:

- 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 they 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 – this includes behaviour taking place both inside and outside of school.

For the avoidance of doubt, if a member of staff/volunteer has concerns that any person may be being mistreated/abused then concerns can be discussed in confidence with:

- The Headteacher
- The Business Manager
- The Chair of Governors if in relation to the Headteacher (chair@gov.st-pauls.org.uk)

The outcome of any investigation by the LADO may be:

- False or Malicious
- Substantiated
- Unfounded
- Unsubstantiated

For further information regarding the reporting of concerns regarding staff, [please refer to our Confidential Reporting Policy](#).

5. Confidentiality and information sharing - Staff

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The school will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- Whether to suspend the member of staff or move them to work not linked with children
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

6. Learning lessons - Staff

After any cases where the allegations are *substantiated*, the school will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual
- Advice from the LADO about referral to DBS for discretionary barring, referral to TRA for teachers, for consideration if it is safe for them to continue teaching during the investigation.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Records are kept according to Data Protection guidance.