



The
Rise
Partnership
Trust
Love • Learn • Laugh

RPT Low Level Concerns Policy

September 2023

Approved	October 2023
Review date	September 2024

With reference to 'Keeping Children Safe in Education' – September 2023

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1. Mission Statement

Rise Partnership Trust schools are committed to pursuing excellence in all that we do; providing the most effective education, therapy, support and provision for all.

2. Aims of policy

Rise Partnership Trust Schools aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Staff maintain an attitude of 'it could happen here' where safeguarding is concerned.

This Policy is reviewed annually to ensure compliance with current regulations and law and must be read in conjunction with our Safeguarding and Child Protection Policy and other relevant RPT policies.

This policy applies to all staff and other individuals who work or volunteer in school. Where staff work across multiple sites any low-level concerns about colleagues should be reported to the relevant Headteacher.

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education September 2023](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by Brent Multi-Agency Safeguarding Children Arrangements.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- The [Childcare \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- *This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).*

4. Definitions

Safeguarding the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

Children includes everyone under the age of 18.

5. Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

All pupils attending RPT schools have Special Educational Needs and Disabilities. As well as the focus upon supporting pupils with SEND we also give special consideration to children who:

- Have special educational needs, disabilities or certain health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Have a parent in prison

6. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff (including supply staff), volunteers and governors in the school and is consistent with the procedures of Brent Multi-Agency Safeguarding Children Partners. Our policy and procedures also apply to off-site activities.

7. Purpose

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Safeguarding and Child Protection policy are lived, monitored, and reinforced.

8. Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of Rise Partnership Trust may have acted in a way that:

- is inconsistent with the Code of Conduct, including inappropriate conduct outside of work (specifically related to safeguarding **AND**
- does not meet the allegations threshold of harm or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern 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 (please refer to the Code of Conduct), 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 RPT from potential false allegations or misunderstandings.

9. Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Head teacher or CEO in the case of Central RPT staff. This includes self-reported concerns. However, it is never too late to share a low-level concern if this has not already happened. Where the Head teacher/CEO is not available, the information will be reported to the designated safeguarding lead (or deputy), i.e. the most senior member of SLT acting in this role.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Head teacher and those about the Head teacher will be reported to the Director of Safeguarding. Concerns about the Director of safeguarding will be reported to the CEO and concerns about the CEO will be reported to the Chair of Trustees. Low level concerns about governors/ trustees will be reported to the Chair of the Trust.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Head teacher or CEO in the case of central RPT staff of the details as soon as possible.

10. Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required, in such cases this will be explained and signposting to relevant support will be offered.

11. Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. Where behaviour is consistent with the Code of Conduct feedback will be given to both parties to explain why the behaviour was consistent with the Code of Conduct. Where behaviour is not consistent with the staff Code of Conduct the necessary action will be taken in line with this policy and where appropriate the RPT Disciplinary Policy. This may result in informal action, such as professional advice, training or development and/ or formal action.

12. Recording and retention of concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Appendix A contains a Low Level Concern (LLC) form that can be used for this purpose. However not having access to the form should not prevent a concern from being shared. Where concerns are reported verbally a record of the conversation will be made by the head teacher which will be signed, timed, and dated.

13. Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The head teacher will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice may also need to be taken)

Where necessary, further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken. Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:
- when considered with any other low-level concerns that have previously been raised about the same individual, these should be reclassified as an allegation and referred to the LADO or Police: a

referral should be made to the LADO and HR advice taken. In this case the school's Code of Conduct and Safeguarding and Child Protection Policy and Disciplinary Policy will be followed.

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

14. Should the low-level concerns file be reviewed?

The records will be reviewed annually, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

15. References

RPT schools should only include in references substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

16. Confidentiality

Any parties affected by or involved in the application of this policy will be expected to maintain an appropriate level of confidentiality. Breaches of confidentiality will be taken seriously, especially if they hinder the application of the policy. Failure to maintain confidentiality may result in action being taken under the disciplinary policy arrangements. Disclosure of information may also be a breach under the Data Protection Act (2018) and may lead to action being taken under the provisions of that Act, in addition to action being taken under the disciplinary policy.

17. What is the role of the Governors?

The head teacher will regularly inform the Local Academy Board about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

18. Other complaints and concerns about school safeguarding practices Other complaints can be raised in accordance with our complaints policy.

19. Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including training on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

20. Monitoring arrangements

This policy will be reviewed **annually**. At every review, it will be approved by trustees.

21. Links to other policies

Policies and processes including staff codes of conduct and behaviour policies are in place to support RPT schools to effectively deal with low level concerns that do not meet harm thresholds.

- Behaviour Policy
- Code of Conduct
- Complaints Policy
- Online Safety Policy
- Health and Safety Policy
- Induction Policy
- Intimate Care Policy
- Medical Policy
- Physical Intervention Policy
- Safeguarding and Child Protection Policy
- Volunteer Policy

APPENDIX A Low-level Concern Form (Insert School Name)

Name of person about whom concerns have been raised:	
Job title:	
School/ Department:	
<p>Details of the concern:</p> <p>Provide a concise record, including a brief context in which the low level concern arose, and details which are chronological and as precise and accurate as possible.</p> <p>Please use a separate sheet if necessary.</p>	
Name of person completing form (PRINT NAME):	
Job title:	
Time and Date when form completed:	
Form received by Name (PRINT NAME):	
Job title:	
Receipt time and date:	
<p>Have low level concerns been raised about this individual previously?</p> <ul style="list-style-type: none"> • If so, provide brief chronological notes. • Consider whether this history, alongside the current concern now meet the threshold for referral set out in KCSIE Section 4, Part 1 	
<p>Action Taken:</p> <p>Provide a concise, chronological record of how the concern was followed-up, including details of any conversations held. Ensure that there is sufficient detail to understand the decision-making process that led to either no further action or an action(s).</p>	
Head teacher signature:	
Signature time and date:	

Please use a separate sheet if necessary This form should be held in a single secure file within each RPT school. In the case of the concern being raised about a member of RPT Central Team this will be held confidentially by the HR Department.

This may be electronic or in hard copy.