



Requirement for Staff to Report Concerns

Introduction

As a community we want to work together to ensure we have an open culture in which it is normal to talk about and reflect on the behaviour of all adults within the community. As part of this we must not shy away from discussing concerns, no matter how small, as this is protective for both children and adults.

To support this aim College has introduced a mechanism for staff to raise any small concerns which might otherwise not be discussed and learnt from.

A low level concern is any concern, no matter how small, and even if no more than a 'nagging doubt', that an adult may have acted in a manner, perhaps inadvertently, which:

- is not consistent with an organisation's Code of Conduct; and/or
- relates to their conduct (including outside of work) and which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

The process is intended and designed to ensure colleagues are able to support each other in self-reflection and learning.

When is it a Low Level Concern?

Staff do not need to be completely sure in each case that their concern is a low level concern in order to raise a worry, that determination can be made by the Safeguarding Lead. However, the information below may act as a guide:

What is an allegation?

Behaviour which indicates that an adult who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

ACTION: report to Head as a matter of urgency

What is a Low Level Concern?

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult working in or on behalf of the school 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 harm threshold or is otherwise not 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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

ACTION: report to Head or DSL as promptly as possible, ideally through

concerns@cheltenhamcollege.org (College)

prep.concerns@cheltenhamcollege.org (Prep)

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.
NO ACTION REQUIRED

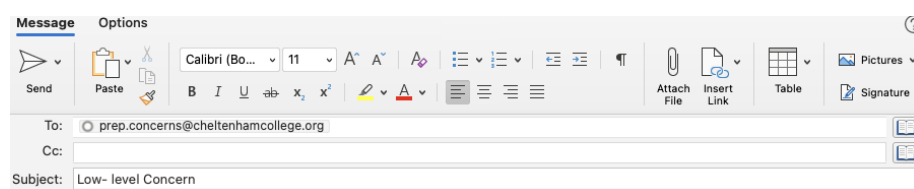
How to Talk Through or Raise a Low Level Concern

Staff may email one of the two addresses below (which go to the DSL) or talk to either the DSL or Deputy DSL to raise a concern or seek advice.

concerns@cheltenhamcollege.org

prep.concerns@cheltenhamcollege.org

Please include details of the concern, who it is about, their job role and department if you know it your name and the date and time in your email.



Message Options

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To: prep.concerns@cheltenhamcollege.org

Cc:

Subject: Low- level Concern

Details of concern:

Name of staff member:

Department & Role:

Signed:

Time and Date:

Over the coming year College intends to train HoDs, HoSs and HSMs who will also provide a listening ear and source of informal advice. Supportive feedback and coaching may come from your Hod, HoS or HSM if a Low Level Concern is raised about you, or you self-refer.

A Supportive and Collaborative Approach

Staff should be reassured that such Low Level Concerns will be dealt with in a sensitive, discreet, and supportive manner which will centre on collaborative working and coaching to enable all colleagues to maintain the ethos and values of the organisation.

College is keenly aware that behaviour outside normal expected standards may indicate that a member of staff is under work or personal pressure and may simply need understanding and support to get through a difficult time. Raising a concern about a colleague in these circumstances will be helpful in ensuring your colleague gets the right help. You will be taking the role of a supportive and critical friend in a way which is protective for your colleague.

Staff should feel confident to self-refer where, for example, they find 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 might consider falls below the expected professional standards. Self-referrals demonstrate effective self-awareness and a desire to learn and improve which is positively encouraged and is protective for everyone.

Low Level Concerns will not be classed as safeguarding concerns unless the DSL determines that they form part of a wider pattern which gives rise to a more serious concern. Where this is judged to be the case then the Head and, normally, the LADO will be informed. The DSL will, as is always the case, work in close partnership with the Head.

In line with the recommendations in Keeping Children Safe in Education, Low Level Concerns will be recorded and held outside both the formal Safeguarding records and the employee's formal personnel file. Staff will always have the chance to talk through any concerns raised and give their point of view. They will be given a copy of the record of any Low Level Concerns before the file is completed so that the record is transparent to them. It may sometimes be the case that the identity of the person raising the report will be anonymised.

Low Level Concerns will be dealt with in a way which best suits the supportive aims of the process, in most cases this will be a coaching conversation, but it will follow the broad steps set out in the process flow below.

Supporting the Aim of the Process

The aim of this process is to provide a mechanism where we can all feel comfortable to support each other to remain mindful of our duty of care to the children we look after. College will take such steps as may be necessary to ensure that we act as colleagues and use this process fairly. Should it be determined that an internal allegation about a member of staff has been raised with malicious intent, then this will be dealt with through the College disciplinary processes.

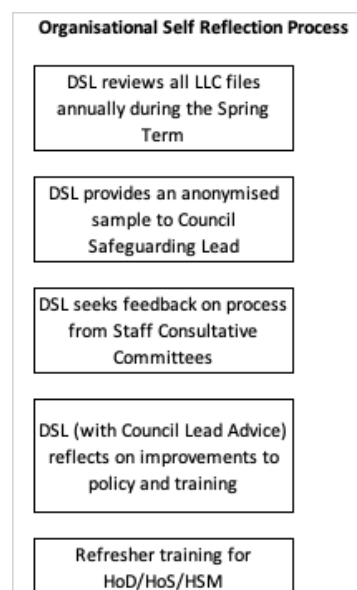
College Policies

Staff may also wish to refer to the following documents:

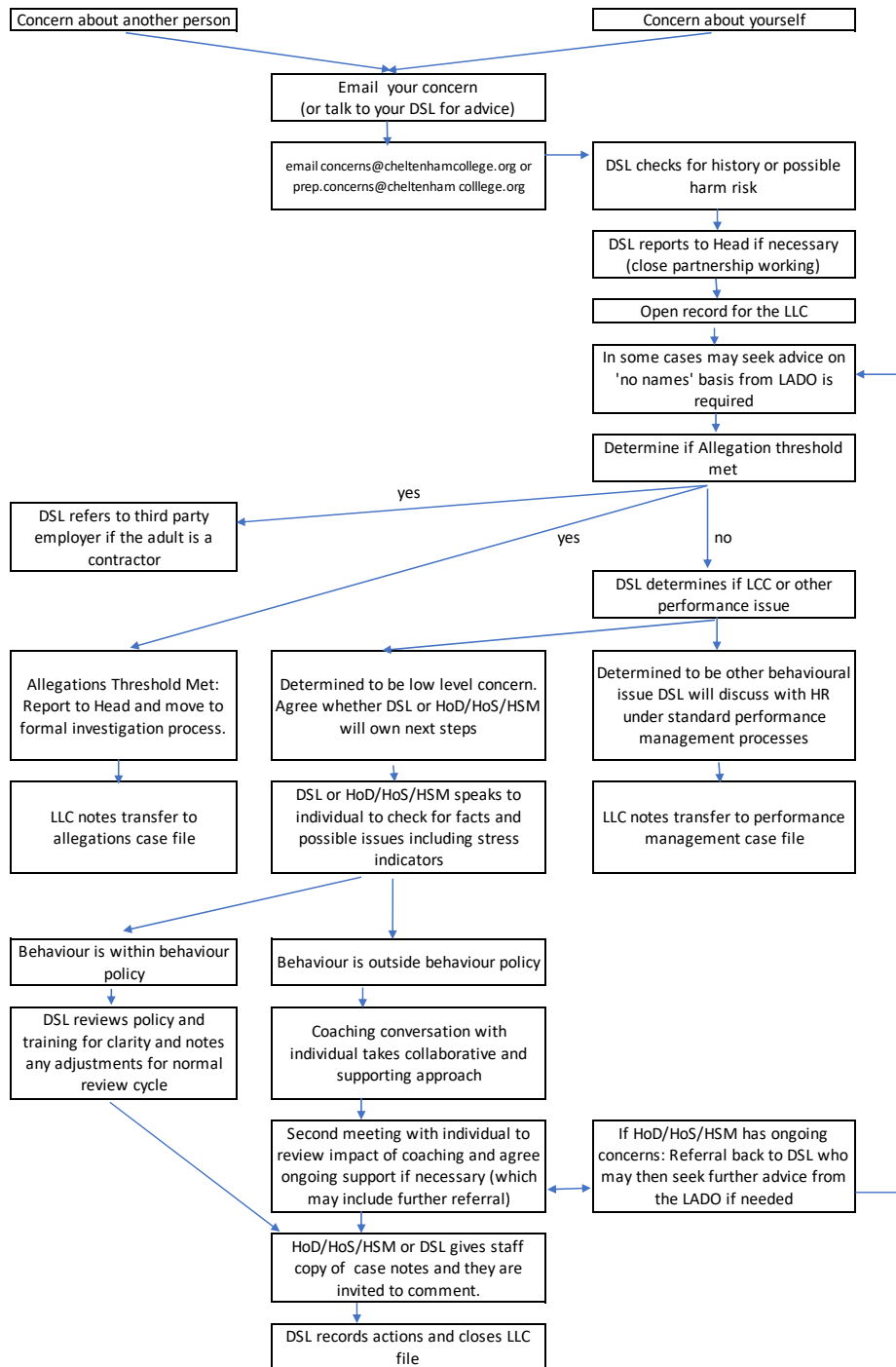
The Staff Code of Conduct (of which this process is an appendix)
The Disciplinary Policy and Procedure
The Capability Policy
The Grievance Policy
The Child Protection and Safeguarding Policy
The Whistleblowing Policy

Organisational Self Reflection

It is important that both schools also have the opportunity to review and reflect on low level concerns in a broader way. This may help to identify changes in ways of working which better support our aspirations to function as a safe and supportive community in which both our pupils and our staff enjoy school life and thrive. The DSL and Head will work in close partnership to ensure there is opportunity for organisational reflection.



Low Level Concerns (LLC) Process



Frequently Asked Questions

Q: What should you do if you have a low level concern about your manager?

A: You can seek informal advice from your school designated safeguarding lead

Q: What should you do if you have a low level concern about the DSL?

A: You can seek advice from your Head. If that is not possible or you feel uncomfortable in approaching the Head, you may go and talk to HR. The most important thing is that you tell someone who can support you to think through what to do next.

Q: Can I make an anonymous report?

A: We want this process to be as open as possible. It is designed to coach people to improve and to support them if they are struggling. However, your name might be anonymised on the low level concerns record in certain circumstances.

Q: If a low level concern is reported about me where will it be stored?

A: This will be kept in a separate record away from either CPOMS or your personnel record. The Head, the DSL and HR will be able to access this record.

Q: How long will you keep a low level concern on file?

A: We will keep it for as long as you remain an employee and then for the same amount of time that we keep your personnel record once you have left. This is important to help us spot patterns to better support you and to support the anonymised organisational self-reflection process.