

EMMANUEL COLLEGE

APPENDIX 3: MANAGING ALLEGATIONS AND LOW-LEVEL CONCERNS



Purpose

The purpose of this policy and the procedures outlined within it seek to create and embed a culture of openness, trust and transparency in which the expected behaviour, values and core virtues of Emmanuel Schools Foundation which are set out in the staff code of conduct and employment handbooks are constantly lived, monitored and reinforced by all staff. Safeguarding children and young people is everyone's responsibility and this includes ensuring that all adults who work with children do so in a way that is in accordance with the ethos and policies outlined above.

Keeping Children Safe in Education September 2021

The following is taken from Keeping Children Safe in Education September 2021

407. 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.

408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) 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?

409. 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 338. A low-level concern is 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 LADO.

410. 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.

411. 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.

412. 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 schools and colleges from potential false allegations or misunderstandings.

Clarity around Allegation, Low-Level and Appropriate Conduct

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.

Low Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- Is not consistent with our Code of Conduct, Values and Virtues and/or
- Relates to their conduct outside of work 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.

Appropriate Conduct

Behaviour which is entirely consistent with our Code of Conduct, Values and Virtues.

Reporting an Allegation or Low-Level Concern

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Principal. This information will be stored in accordance with our GDPR and data protection policies.

1. Reporting an allegation

Contact the Principal immediately by asking to speak to him urgently during school hours to report an allegation or by writing a written report using email sent directly to the Principal and alert the Executive Assistant that you have done so.

2. Reporting a low-level concern

Low level concerns should be reported directed to the Principal by completing the online form available [here](#), this is accessible only by the Principal and Vice Principals.

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

Emmanuel College, 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.

Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2021.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020pdf>

Process that is followed when a concern is raised about a member of staff



