



Safeguarding: Low-level Concerns

We believe this policy should be a working document that is fit for purpose, represents Pewsey Vale School ethos, enables consistency and quality across Pewsey Vale School and is related to the following legislation:

- Children Act 1989
- Police Act 1997
- Police Act 1997 (Criminal Records) Regulations 2002
- Education Act 2002
- Children Act 2004
- Education and Inspections Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Children and Young Persons Act 2008
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Education Act 2011
- Protection and Freedoms Act 2012

The following documentation is also related to this policy:

- 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 (DfE 2018)
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

We have in place safeguarding procedures that manage any safeguarding concern about adults that are associated with Pewsey Vale School, including school personnel, supply staff, volunteers, contractors and governors. For this policy, the term school personnel will be used to represent all aforementioned adults.

We work hard to promote an open and transparent culture with school personnel, understanding;

- what is and is not acceptable;
- that all concerns about adults working in or on behalf of Pewsey Vale School must be reported;
- that all concerns are dealt with promptly and appropriately.

We have in place a school personnel code of conduct which is understood and followed by all school personnel who understand that abuse can happen in any organisation.

We understand that the term 'harm threshold' refers to behaviour of an individual that poses a risk of harm to children when it is alleged that they have:

- 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.

We are aware that if a member of staff has a concern about:

- another member of Pewsey Vale School personnel; then they should report their concern to the DSL (Designated Safeguarding Lead);
- the headteacher; then they should report to the chair of governors.





We understand that those concerns that do not meet the harm threshold are referred to as 'low-level concerns'. 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 Pewsey Vale 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 considered serious enough to consider a referral to the DOFA/LADO.' (Keeping Children Safe in Education (DfE))

We need to ensure that at all times adults working in or on behalf of Pewsey Vale School are clear about professional boundaries and that they act within these. Any concerning, problematic or inappropriate behaviour that is identified and reported minimises the risk of abuse. We believe the following behaviour needs to be brought to the attention of the designated safeguarding lead (DSL) or to the deputy designated safeguarding lead (DSL):

- being overfriendly 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.

We understand that:

- at all times the DDSL must inform the DSL of all low-level concerns;
- it is critical that all concerns are shared with the DSL recorded and dealt with;
- school personnel do not need to determine whether a concern meets the harm threshold or constitutes a low-level concern;
- the DSL will make the ultimate decision to any concern in consultation with the DDSL;
- the DSL who has any doubt as to whether the information which has been shared about a member of Pewsey Vale School personnel as a low-level concern in fact meets the harm threshold will consult with the DOFA/LADO;
- any low-level concern shared about supply staff or contractors will be notified to their employers.

We believe we have a duty to:

- respond to all concerns in a sensitive and proportionate way promptly and effectively;
- promote a healthy, informed and more effective safeguarding culture;
- ensure that all school personnel understand what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from inappropriate or concerning behaviour in themselves and others.

We as a school community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

We all have a responsibility to ensure equality permeates in to all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that are connected with this policy.





Aims

- To respond to all concerns in a sensitive and proportionate way, promptly and effectively.
- To promote a healthy, informed and more effective safeguarding culture.
- To have in place a school personnel code of conduct which is understood and followed by all school personnel who understand that abuse can happen in any organisation.
- To ensure compliance with all relevant legislation connected to this policy.
- To share good practice within Pewsey Vale School, with other schools and with the local authority in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Governing Body

The governing body has:

- delegated powers and responsibilities to the DSL to ensure that all school personnel are aware of Pewsey Vale School code of conduct for safeguarding children.
- delegated powers and responsibilities to the DSL to ensure:
 - ❖ compliance with procedures and practice of the local authority and the local safeguarding children board (LSCB);
 - ❖ procedures are in place to deal with all allegations against school personnel and volunteer helpers;
 - ❖ allegations against school personnel or volunteer helpers are referred to the local authority's designated officer for allegations (DOFA);
 - ❖ compliance with their legal duty of referring to the disclosure and barring service (DBS) if a member of Pewsey Vale School personnel or volunteer helper has been dismissed due to safeguarding concerns.
- responsibility for ensuring that the chair liaises with the local authority and complies with all procedures and practices when dealing with an allegation of abuse against the headteacher;
- delegated powers and responsibilities to the DSL to ensure all school personnel and stakeholders are aware of and comply with this policy;
- responsibility for ensuring:
 - ❖ full compliance with all statutory responsibilities;
 - ❖ Pewsey Vale School complies with all equalities legislation;
 - ❖ funding is in place to support this policy;
 - ❖ this policy and all policies are maintained and updated regularly;
 - ❖ all policies are made available to parents;
 - ❖ the nomination of a designated equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
 - ❖ the nomination of a link governor to:
 - visit Pewsey Vale School regularly;
 - work closely with the DSL and the DDSL;
 - ensure this policy and other linked policies are up to date;
 - ensure that everyone connected with Pewsey Vale School is aware of this policy;
 - attend training related to this policy;
 - report to the governing body every term;
 - annually report to the governing body on the success and development of this policy.
 - ❖ the effective implementation, monitoring and evaluation of this policy.





Role of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)

The designated safeguarding lead and deputy designated safeguarding lead will:

- ensure all school personnel are aware of the designated safeguarding lead and will take the lead in dealing with child protection issues;
- work closely with and consult with the deputy designated safeguarding lead;
- ensure the implementation of this policy and will ensure everyone connected with Pewsey Vale School is aware of this policy;
- be trained in safeguarding and child protection policy procedures;
- renew training every two years in order to:
 - ❖ understand the assessment process;
 - ❖ understand the procedures of a child protection case conference and child protection review conference;
 - ❖ understand the specific needs of children in need;
 - ❖ understand the specific needs of children with special educational needs and those of young carers;
 - ❖ have in place a secure and accurate record system of all concerns and referrals.
- work hard to create an open and transparent culture in which all safeguarding concerns and allegations about adults including those that do not meet the threshold are recorded and dealt with;
- will regularly remind school personnel:
 - ❖ of the importance of the 'school personnel code of conduct' and of the standard of behaviour expected of them;
 - ❖ to share any concerns about behaviour that is not appropriate;
 - ❖ of the importance of this policy;
 - ❖ to share all concerns with the headteacher or the DDSL.
- monitor and identify any potential patterns of inappropriate behaviour, problematic or concerning behaviour;
- respond to all concerns in a sensitive and proportionate way promptly and effectively
- deal with all low-level concerns by:
 - ❖ speaking to the person who raised the concern, unless it has been raised anonymously;
 - ❖ speaking to the individual involved, unless advised not to do so by the DOFA or other relevant agencies where they have been contacted;
 - ❖ speaking to any witnesses;
 - ❖ collecting and reviewing the information and then determining whether the behaviour:
 - is appropriate and is consistent with Pewsey Vale School personnel code of conduct;
 - meets the harm threshold and should be referred to the DOFA/other relevant agencies;
 - constitutes a low-level concern;
 - is reported again about the same individual and may meet the harm threshold and should be referred to the DOFA/other relevant agencies.
- be aware that all low-level concerns must be:
 - ❖ recorded in writing and include:
 - details of the concern;
 - the context in which the concern arose;
 - the name of the individual sharing their concerns;
 - if the individual wishes to remain anonymous then that should be respected as far as reasonably possible;
 - the name of the adult about whom the concern has been raised
 - names of any relevant witnesses;
 - all internal conversations;





- all external conversations with the DOFA/other relevant agencies and their advice, decision given and the reasoning for that decision;
- the action taken will be taken in accordance with the advice of the DOFA/other relevant agencies.
- ensure that once it is determined that the behaviour is entirely consistent with Pewsey Vale School personnel code of conduct then the DSL will:
 - ❖ speak with the adult about whom the concern has been raised to inform them of the action taken;
 - ❖ update the individual who shared the low-level concern to inform them of how and why the reported behaviour is consistent with Pewsey Vale School personnel code of conduct;
 - ❖ consider reviewing Pewsey Vale School personnel code of conduct and school personnel awareness training.
- refer any low-level concern about a person employed by Pewsey Vale School to their employer, such as a supply agency or a contractor, so that any potential patterns of inappropriate behaviour can be identified;
- ensure all documentation will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR);
- review the low-level concerns file periodically in order to ensure:
 - ❖ all such concerns have been dealt with promptly and appropriately;
 - ❖ potential patterns of inappropriate, problematic or concerning behaviour are identified.
- not include any low-level concerns in references unless they relate to issues which would normally be included in a reference;
- ensure that all school personnel are aware of their responsibilities that are outlined in this policy;
- ensure that all school personnel are aware of the safeguarding and child protection policy and all other associated school policies;
- ensure all school personnel, governors and volunteer helpers undertake annual safeguarding training;
- ensure risk assessments are:
 - ❖ in place and cover all aspects of this policy;
 - ❖ accurate and suitable;
 - ❖ reviewed annually;
 - ❖ easily available for all school personnel.
- keep a confidential child protection register of all those pupils known to be at risk and only if it is confirmed by social services that the child is at risk;
- be trained in working with all agencies;
- investigate and deal with all cases of suspected or actual problems associated with child protection;
- ensure parents are aware that referrals about suspected abuse or neglect may be made;
- make child protection referrals;
- record all child protection referrals;
- co-ordinate action within Pewsey Vale School;
- liaise and seek advice from the local authority's designated officer (DOFA) when the need arises;
- liaise with social care and other agencies;
- transfer the child protection file of any pupil leaving to join another school;
- provide support for any child at risk;
- not promise confidentiality to any child but always act in the interests of a child;
- act as a source of advice within Pewsey Vale School;
- help create a culture within Pewsey Vale School of listening to children;
- keep up to date will all new guidance on safeguarding children;
- keep all school personnel up to date with any changes to procedures;
- organise appropriate training for school personnel and governors;
- ensure all incidents are recorded, reported and kept confidential;
- keep all paperwork up to date;





- report back to the appropriate school personnel when necessary;
- work closely with the link governor;
- provide leadership and vision in respect of equality;
- make effective use of relevant research and information to improve this policy;
- provide guidance, support and training to all new staff, new governors and new volunteer helpers;
- monitor the effectiveness of this policy by speaking with school personnel and governors;
- provide termly reports to the governing body;
- annually review the policy;
- annually report to the governing body on the success and development of this policy.

Role of School Personnel

School personnel will:

- comply with all aspects of this policy;
- work hard to create a school culture that is based on mutual and appropriate respect;
- be regularly reminded on the importance of Pewsey Vale School personnel code of conduct so that all personnel are clear on the standard of behaviour expected of them;
- be trained on standards of behaviour;
- be expected to report any concerns about behaviour that is not appropriate or acceptable to the DSL/DDSL;
- accept that abuse could happen in this educational institution;
- help identify any weaknesses in the safeguarding procedure system;
- be aware that they have the right to remain anonymous if they report a concern but will understand there may be circumstances where they will need to be named;
- self-refer if they find themselves in a situation which:
 - ❖ could be misinterpreted;
 - ❖ might appear compromising to others;
 - ❖ on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- read both Part One and Annex B of 'Keeping Children Safe in Education' (KCSiE) guidance if they work directly with children;
- read Part One or Annex A if they do not work directly with children;
- be aware of their roles and responsibilities;
- understand that safeguarding and promoting the welfare of children is everyone's responsibility;
- attend appropriate safeguarding and child protection training at induction;
- be made aware of the following policies:
 - ❖ Safeguarding and Child Protection
 - ❖ Behaviour
 - ❖ School Personnel Behaviour
 - ❖ Child Gone Missing On or Off Site
 - ❖ Role of Designated Safeguarding Lead (DSL)
- attend regular updated safeguarding training;
- be aware of all safeguarding systems within Pewsey Vale School;
- be in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating;
- have responsibility to provide a safe environment in which children can learn;
- be prepared to identify children who may benefit from early help;
- follow the processes as set out in KCSiE (paragraphs 51-67) if they have any concerns about a child's welfare;
- be aware of the process for making referrals to the local authority;
- support social workers and other agencies following any referral;





- report to the designated safeguarding lead any concerns they have regarding a child;
- know what to do if a child tells them they are being abused, exploited or neglected;
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe;
- be familiar with 'Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children (DfE).'

Raising Awareness of this Policy

We will raise awareness of this policy via:

- School personnel handbook;
- Headteacher reports to the governing body;
- Email;
- Staffroom safeguarding board;
- Annual safeguarding training.

Training

We ensure:

- all school personnel:
 - ❖ have received the appropriate training on all safeguarding policies and procedures;
 - ❖ are familiar with the following documentation:
 - Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
 - Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children
 - ❖ are aware of the following linked policies:
 - Safeguarding and Child Protection
 - School Personnel Code of Conduct
- the content of all training is correct, delivered well and engages staff as we believe that the more engaging training is, the better the outcomes that we need to measure;
- all school personnel understand and undertake their role in safeguarding and child protection effectively.

Safeguarding

We are committed to safeguarding and promoting the welfare of all children as the safety and protection of children is of paramount importance to everyone in this school. We work hard to create a culture of vigilance and at all times we will ensure what is best in the interests of all children.

We believe that all children have the right to be safe in our society. We recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere through our teaching and learning, pastoral support and care for both pupils and school personnel, training for school personnel and with working with parents. We teach all our children about safeguarding.

We work hard to ensure that everyone keeps careful watch throughout Pewsey Vale School and in everything we do for possible dangers or difficulties. We want all children to feel safe at all times. We want to hear their views of how we can improve all aspects of safeguarding and from the evidence gained we put into place all necessary improvements.





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.

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 the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the policy holder, the Headteacher and the nominated governor.

Linked Policies

- Safeguarding and Child Protection
- School Personnel Code of Conduct

We believe this policy:

- has been reviewed thoroughly by the safeguarding governor and the designated safeguarding lead has been questioned on it to make sure it stands up to scrutiny;
- flows and is easy to follow;
- is an essential part of Pewsey Vale School;
- supports staff in managing certain situations;
- forms an important framework that will ensure consistency in applying values and principles throughout the establishment;
- provides guidance, consistency, accountability, efficiency, and clarity on how Pewsey Vale School operates;
- provides a roadmap for day-to-day operations;
- ensures compliance with laws and regulations, gives guidance for decision-making, and streamlining internal processes;
- is designed to influence and determine all major decisions, actions and all activities taking place within the boundaries set by them;
- stems from Pewsey Vale School's vision and objectives which are formed in strategic management meetings;
- has been received by all school personnel via appropriate safeguarding training;
- is provided to all school personnel and a hard copy can be found on the safeguarding board located in the school staffroom.





Headteacher:		Date:	
Chair of Governing Body:		Date:	

Date	Review Date	Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Nominated Governor
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