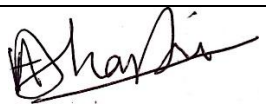
LOW LEVEL CONCERNS POLICY

Date this policy takes effect:	Review frequency:	Date to review:	Date to be ratified:
2.10.2023 Reviewed 02.06.2025	Every two years	CEO Summer 2027	Education & Safeguarding Summer 2027
How will Trustees be assured this has been implemented?		Through analysing concerns and complaints made to the Trust	
Signed:		Sash Hamidi (CEO)	
Signed:		Aliya Dhanji (CHAIR OF TRUSTEES)	
All policies are subject to change or review in light of Government guidance or when applied.			
This policy works alongside the following policies: *SEND Policy, Allegations, Behaviour, Attendance, Exclusions,*			

THE PEGASUS PARTNERSHIP TRUST

"Children First"

Our Vision Statement

Within The Pegasus Partnership Trust, our vision and aims of education are underpinned by the UNICEF United Nations Conventions on the Rights of the Child (UNCRC).

We believe:

- All learning should be purposeful and experiential
- In learning values and skills for whatever the future brings
- We can be world changers

We are a PRIMARY MAT for PRIMARY SCHOOLS so every child's PRIMARY EXPERIENCE enables lifelong learning

This means we are committed to providing an education, for all children, that should develop their personality, talents and abilities to the full (article 29). We encourage a sense of community spirit, where children pastoral care and well-being underpins academic, co-curricular and sporting excellence. We aim to achieve this through an inspiring curriculum, that is child-centred (article 3), and extends child learning beyond the constraints of the classroom. We want to instil a life-long love of learning and equip children with skills that develop their independence, critical thinking, self-awareness, resilience and self-confidence.

Statement of intent

The Pegasus Partnership Trust aims to ensure that all personal data collected about staff, children, parents, those in governance, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill. The academy may, from time to time, be required to share personal information about its staff or children with other organisations, mainly the LA, other schools and educational bodies, and potentially social services. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Safeguarding Statement

The Pegasus Partnership Trust respects and values all children and are committed to providing a caring, friendly and safe environment for all our children so they can learn, in a relaxed and secure atmosphere (article 31). We believe every child should be able to participate in all academy activities in an enjoyable and safe environment and be protected from harm (article 19). This is the responsibility of every adult employed by, or invited to deliver services to academies within the Trust. We recognise our responsibility to safeguard all who access school and promote the welfare of all our children by protecting them from physical, sexual and emotional abuse, neglect and bullying.

Equality Statement

At The Pegasus Partnership Trust, we ensure equality of education and opportunity for all children, staff, parents and carers receiving services from the academy, irrespective of age, race, gender (re-assignment), disability (article 23), religion and belief (article 14), sexual orientation, marital/cohabiting status or socio-economic background (article 2). We develop a culture of inclusion and diversity in which all those connected to the academy feel proud of their identity and able to participate fully in academy life.

The achievement of children is monitored by race, gender and disability and we use this data to support children, raise standards and ensure inclusive teaching. We tackle discrimination by the positive promotion of equality, challenging bullying and stereotypes and creating an environment which champions respect for all. We believe that diversity is a strength, which should be respected and celebrated by all those who learn, teach and visit here.

This policy sets the expectation that all staff at The Pegasus Partnership Trust (the "Trust") see themselves as learners and therefore reflects their development as professionals.

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1.0 Introduction

At The Pegasus Partnership Trust, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

2.0 Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff or adult should inform the Academy Lead about their concern using a Low-Level Record of Concern Form. If the Academy Lead cannot be contacted, CEO should be contacted instead.

3.0 Keeping Children Safe in Education September 2023

The following is taken from Keeping Children Safe in Education September 2023: *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*

*426. Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:*

- *enable schools and colleges to identify inappropriate, problematic or concerning 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?

427. The term 'low-level' concern does not mean that it is insignificant.

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 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 children.

428. *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.*

429. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

430. It is crucial that all low-level concerns 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 becoming the subject of potential false low-level concerns or misunderstandings.

4.0 Clarity around Allegation vs Low-Level Concern vs 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 an organisation's Code of Conduct, 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 the organisation's Code of Conduct, and the law.

5.0 Storing and use of Low-Level Concerns (LLC) and follow-up information

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Academy Lead or those aware in the senior leadership team.

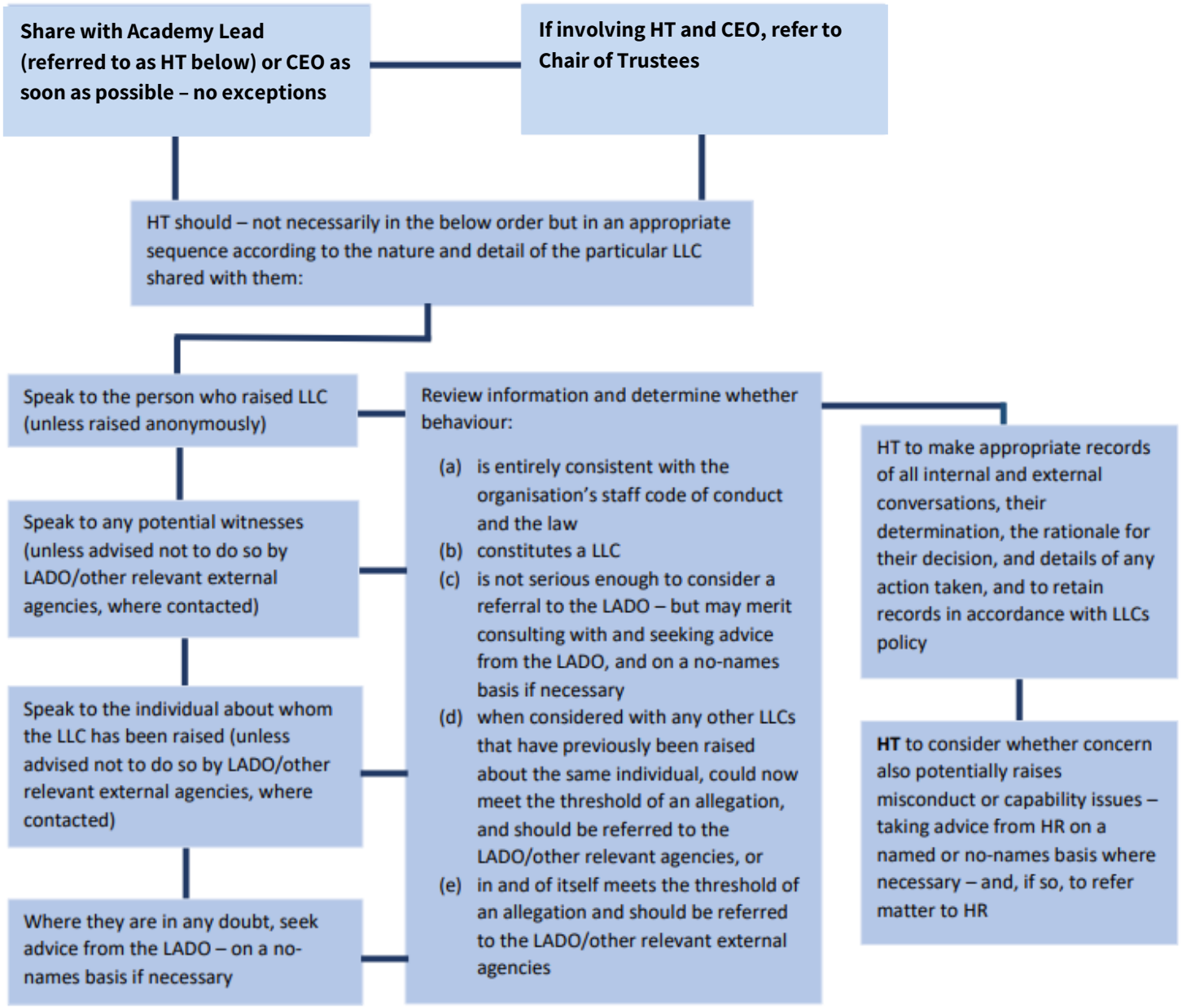
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave The Pegasus Partnership Trust, 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.

6.0 Process to follow when a Low-Level Concern is raised



7.0 Key Reference Document

Read further information about Low-Level Concerns, which is referenced in KCSIE.

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

8.0 Low Level Concern Form

This form will be available to staff via:

- Appendix A
- Direct conversation with Academy Lead or CEO

9. 0 Employee Support

Support

9.1 All staff have access to Education Support 08000 562561 or https://www.educationsupport.org.uk/ This is a confidential helpline service including online chat and email options.

9.2 All employees can also contact their unions/professional associations for support.

9.3 All employees have access to the School Wellbeing Programme:



9.4 All employees have access to an in-school counsellor (details available within the academy you are based)

10.0 Monitoring and Review of the Policy

10.1 The Academy Leads and/or the CEO is responsible for monitoring the implementation, use and effectiveness of this policy and will report on these matters annually or more frequently if necessary.

10.2 This policy will be reviewed by the Board of Trustees as necessary. Links to other polices are on the front cover.

Low-Level Record of Concern Form
Regarding ANY Adult

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- *is not consistent with The Pegasus Partnership Trust's Code of Conduct, 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.*

Where possible please speak with the Academy Lead as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Academy Lead. When completed, please pass this form to the Academy Lead. If the concern is about the Academy Lead, please pass it onto the Executive Headteacher or CEO. If the concern is about the Executive Headteacher or CEO, please pass it to the Chair of Trustees. Remember, a low-level concern is different to an allegation (which uses a different form). See 4.0 for a definition.

Name of adult writing this concern:

Name of adult whom this concern is about:

Date written:

Please write your concerns below (continue overleaf)

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). Consider any contextual information that may be appropriate to know.

Signature: