

### Low level concern policy

Date	Version	Summary of Amendments	Author
05.08.2021	1a	n/a	JC
05.01.2023	2	To reflect change from BIS to SEI; change in DSL	JC

### Scope

This policy sets out how to deal with all adult behaviour towards students which does not fall under the scope of the Safeguarding policy. It is to be read in conjunction with the Safeguarding Policy, Complaints Procedure and Whistleblowing Policy.

It is important to be alert to low level behaviour because it allows the school to educate adults about boundaries, to intervene early and to minimise the risk of abuse. It is hoped that all staff and other associated adults will support the school in creating a culture of openness and transparency to help achieve this aim.

This policy is based on Keeping Children Safe in Education 2022 (government guidance).

### Definition

All behaviour of an adult towards a student which is not consistent with the staff and host family code of conduct and the positive and constructive attitude towards young people described in the hosting agreements, host family handbook and staff handbook, but does not meet the harm threshold, constitutes a low level concern incident. Adults are not only members of staff, but any adults with access to students (contractors, staff of Cardinal Newman Catholic School, visiting parents or guest speakers etc). Unprofessional behaviour towards a student by a member of staff also falls under the scope of this policy. Examples of low-level concerns are having favourites, having one-to-ones behind closed doors, humiliating a student, being overfriendly, taking unauthorised photographs.

The behaviour in question can be intentional or unintentional.

Proprietor: South England Exchange Ltd.

Registered office: 12 Russell Mews, Brighton, BN12HZ

24 hour hotline: 07796997780

DSL: Nigel Flude; Deputy DSL: Juliet Cassells

info@southeastexchange.org

## Reporting

Students, schools and host families should report incidents to the DSL or the principal either verbally or in writing. Staff are required to report any unusual incidents immediately and in writing to the DSL using the *unusual incident form*. Self-reporting is encouraged to clarify incidents.

## Response

The Designated Safeguarding Lead (DSL) or Deputy DSL will speak to the reporting individual and review the case. On this basis, they will decide if the reported incident is acceptable or constitutes a safeguarding issue or a low level concern.

If in doubt, the DSL will ask the LADO for advice on a no-names basis.

In case of a safeguarding incident, the DSL will follow the procedure set out in the Safeguarding Policy.

In case of a low level concern, it is important to treat the incident sensitively, proportionally and on a need-to-know basis. The DSL will speak to the reported adult and make them aware of the concern, explain why the behaviour is of concern, what change in behaviour is required and, where appropriate, ask what the school can do to support them with the change. It should also be set out what the consequences of repeated failure to change behaviour will be.

## Records

An initial record of the report will be stored on Zoho. All fields on this form are encrypted when they are being stored in Zoho's database, for added security. The DSL or deputy DSL will take notes about any conversations concerning the case and about its progress and conclusion.

Records will be reviewed on a regular basis to determine any evolving patterns which may be of higher significance than an isolated incident.

## Consequences

Most cases will be minor and require no or minimal intervention. Where the impact on the student is more significant but fails to qualify as abuse or neglect under the Safeguarding Policy, and the reported adult does not change their behaviour despite being repeatedly spoken to, it is in the discretion of the company director to decide what further consequences will be appropriate, up to and including terminating the contract of employment or hosting agreement with this individual.