



ALPHA PLUS GUARDIANS LTD Low Level Concerns Policy

This policy forms part of the Alpha Plus Guardians Code of Conduct and should be read in conjunction with the Alpha Plus Guardians Safeguarding Policy. The low level concerns policy is based upon the statutory guidance 'Keeping Children Safe in Education 2023.

Creating a culture in which *all* concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, and recorded and dealt with appropriately, is crucial. If implemented well this should encourage an open and transparent culture; enable staff/homestays to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Alpha Plus Guardians are clear about professional boundaries and act within them, in accordance with the ethos and values of the guardianship organisation.

Behaviour which is not consistent with the standards and values of Alpha Plus Guardians, and which does not meet the expectations encapsulated in staff/homestay code of conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

Purpose of a Low Level Concerns Policy

This policy enables all staff/homestays to share any concerns – no matter how small – about their own or another member of staff's behaviour with the Alpha Plus Director and Designated Safeguarding Lead.

Safeguarding and promoting the welfare of children is everyone's responsibility.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the staff/homestay code of conduct, are constantly lived, monitored and reinforced by all staff/homestays.

In order to achieve this purpose, Alpha Plus Guardians will:

- ensure that staff/homestays are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- empower staff/homestays to share any low-level concerns with the Alpha Plus Guardians Director and to help all staff/homestays to interpret the sharing of such concerns as a neutral act;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the LADO;
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weaknesses in the organisation's safeguarding system.

Low Level Concern that does not meet the harm threshold

The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does NOT meet the 'threshold of allegation harm'. The Allegation of Harm threshold means that the alleged person who works with children has:

- 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.

The threshold for 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 may have acted in a way that:

- is inconsistent with an organisation's staff/homestay code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO.

Staff/Homestays do not need to be able to determine in each case whether their concern is a low level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff/Homestays have shared what they believe to be a low level concern, that determination should be made by the Alpha Plus Guardians Director in line with this policy.

Sharing Low Level Concerns

- All Low Level Concerns should be shared with the Alpha Plus Director
- All Low Level Concerns should be shared as soon as reasonably possible

Responding to Low Level Concerns

- All Low Level Concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose and all action taken
- All records of Low Level Concerns will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified
- Where a pattern of such behaviour is identified, the Alpha Plus Director will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it will be referred to the LADO
- Alpha Plus Guardians will respect the Staff member/Homestay's anonymity as far as possible, however, there may be circumstances where the staff/homestay member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity will never be promised to staff/homestays who share low-level concerns. Where possible, Alpha Plus Guardians will try to encourage staff/homestays to consent to be named, as this will help to create a culture of openness and transparency.
- Where the Alpha Plus Guardians Director is in any doubt, the Director will always seek advice from the LADO

Outcomes from Low Level Concerns

If it is determined that the behaviour is entirely consistent with the staff/homestay code of conduct and the law, the Alpha Plus Guardian Director will:

- update the individual in question and inform them of the action taken
- speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation’s staff code of conduct and the law;
- Consider if the situation may indicate that the staff code of conduct or low-level concerns policy are not clear enough, or if further training is required.

If it is determined that the behaviour constitutes a low-level concern:

- It will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff/homestay from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis;
- Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;
- In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening.

Any such conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.

- Ongoing and transparent monitoring of the individual’s behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;

Supporting Policies:

Please find the supporting policies on the Alpha Plus Guardian Services Ltd website:

www.alphaplusguardians.co.uk

Here you will find the following policies: Safeguarding, Missing Students, Student Code of Conduct, Anti-bullying, Staff Code of Conduct, Anti-radicalisation, Grievance, Complaints, and Whistleblowing.

Contact details

Alpha Plus Director and Designated Safeguarding Officer: Mrs Emma Ryan

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+44 (0) 7981 705275 24 hours

Next review date: 30th March 2024