



Low Level Concerns Policy

Rationale

Wings operates an open and transparent culture in which all concerns about adults working with children are shared responsibly and promptly, and recorded and dealt with appropriately. This minimizes the risk of potential abuse by identifying inappropriate, problematic or concerning behaviour early. It ensures that all adults working with children, young people and vulnerable adults are clear about professional boundaries. Staff are expected to work as a team, and to monitor each other's practice.

Low Level Concerns

These are any concerns about any adult, whether staff member, sessional worker, volunteer or contractor working for the Organisation who has acted in a way inconsistent with the Staff Code of Conduct (either within working hours or outside of work), where the concern does not meet the harm threshold or makes another adult uncomfortable. The concern may refer to a safeguarding issue or a matter of professional conduct.

Low Level Concerns may arise in a number of ways: a suspicion or a complaint; a disclosure made by a service user, parent, carer or other adult; or as a result of vetting checks. Staff members who believe they have acted in any way which is inconsistent with the Staff Code of Conduct should feel confident to self refer to the DSL or CEO.

It is essential that Low Level Concerns are treated seriously and reported to the DSL or CEO. The DSL will report concerns to the CEO.

The CEO will investigate the concern by speaking to the staff member who raised the concern (unless anonymously), to the person concerned and to any witnesses.

Recording Low Level Concerns

Records of Low Level Concerns are compiled by the CEO and are kept securely in an encrypted electronic file in compliance with UK GDPR. They are kept as long as the individual remains in the employment of the Organisation. The name of the person reporting the concern will be included, unless that person requests anonymity.

Records are reviewed regularly by the CEO to identify any patterns of behaviour and reported to the Trustees in September each year or sooner if concerns escalate.

Procedure

The CEO (or nominated Trustee) will collect as much evidence as possible by speaking to the person who raised the concern, the person involved and any witnesses.

The CEO (or nominated Trustee) will determine the seriousness of the concern by referring to the Staff Code of Conduct and Disciplinary Policy.

If a pattern of behaviour is identified which meets the harm threshold, the LADO will be contacted. Where a pattern of behaviour is identified which does not meet the harm threshold, it will be dealt with through the Organisation's Disciplinary Procedure.

In the event that a pattern of behaviour is identified, consideration will be given to whether any cultural issues within the Organisation have enabled the behaviour, and whether any policies need to be reviewed or additional staff training given.

References

Where the Organisation is asked to provide a reference for a member of staff or volunteer, Low Level Concerns about the individual will only be included where they are substantiated and meet the harm threshold.