



Bosco Safeguarding & Child Protection Policy & Statement

For all schools within the Bosco Catholic Education Trust

This Safeguarding & Child Protection Policy has been approved and adopted by the Bosco Catholic Education Trust

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1. Bosco Catholic Education Trust Mission Statement

The Bosco Catholic Education Trust is a Christ-centred family of Catholic academies, within the Diocese of Arundel and Brighton, working together as one body to provide an outstanding education for all. As Catholic schools, we endeavour to develop confident, compassionate and faithful young people. Through partnership, collaboration and mutual support, we seek to enable all those entrusted to our care to become the person God called them to be.

“Serve the Lord joyfully”

2. Introduction

At Bosco Catholic Education Trust, we take safeguarding very seriously - safeguarding and promoting the welfare of children is everyone’s responsibility. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the Trust’s safeguarding responsibilities.

This includes ensuring that all adults who work with children do so in a way that is in accordance with the values, ethos and culture of the Trust as set out in the Staff Code of Conduct, Whistleblowing and Safeguarding policies.

3. Bosco Safeguarding Statement

- 3.1 The Bosco Catholic Education Trust (“the Trust”) takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within the Trust to identify, assess, and support those children who are suffering harm.
- 3.2 This statement applies to all members of staff, governors and directors in the Trust.
- 3.3 The Trust believes that the health, safety and well-being of every child is our top priority, and we expect all staff, governors and volunteers to share this commitment. We believe that pupils have a right to learn in a supportive, caring and safe environment which includes the right to protection from all types of abuse; where staff are vigilant for signs of any pupil in distress, undergo regular training and are confident about applying our safeguarding processes to avert and alleviate any such problems.
- 3.4 To help us carry out our safeguarding responsibilities, each school has a Safeguarding and Child Protection Policy in place along with a number of other supporting policies.
- 3.5 To help us carry out our safeguarding responsibilities, the Trust abides by the WSCC Policy on Child Protection and Safeguarding.

4. Bosco Schools

4.1 Each school within the Trust has a Safeguarding and Child Protection Policy in place along with a number of other of supporting policies that are available for each school. Each school has a named Designated Safeguarding Lead (DSL).

School	Safeguarding Team	Safeguarding Policy
Annecy Catholic Primary School	Annecy Safeguarding Team	Annecy Policies
Our Lady Queen of Heaven Catholic Primary School	OLQOH Safeguarding Team	OLQOH Safeguarding Policy
St Joseph's Catholic Primary School	St Joseph's Safeguarding Team	St Joseph's Policies
St Mary's Catholic Primary School	St Mary's Safeguarding Team	St Mary's Policies
St Paul's Catholic College	St Paul's Safeguarding Team	St Paul's Policies
St Peter's Catholic Primary School	St Peter's Safeguarding Team	St Peter's Safeguarding Policy
St Philip Howard Catholic School	SPH Safeguarding Team	SPH Policies
St Wilfrid's Catholic Primary School	St Wilfrid's Safeguarding Team	St Wilfrid's Safeguarding Policy

5. Aims

This policy is a key part of the Trust's over-arching aim to create and embed a culture of openness, trust, and transparency where our values are lived and the behaviours we expect from all our staff are monitored and reinforced. This policy will help the Trust:

- 5.1 Create a culture (e.g., our ethos, values and behaviours) in which all concerns about adults are shared responsibly with the right person and are recorded and dealt with appropriately.
- 5.2 To identify concerning, problematic or inappropriate behaviour early.
- 5.3 Minimise the risk of abuse occurring.
- 5.4 Ensure that adults working in or on behalf of the Trust are clear about and act within professional boundaries.
- 5.5 Create an environment where all staff are comfortable to self-refer.

6 Low Level Concerns

The Trust recognises its duty to enable all staff to share any low-level concerns they might have about their own or another member of staff's behaviour with the Trust's Senior Leadership Team ("SLT") or Trust Board.

To achieve this purpose, the Trust will ensure, through training and other appropriate means such as staff Inset days, that its staff are:

- 6.1 Clear about what 'expected and appropriate behaviour' is (as visualised in the Spectrum of Behaviour Diagram below).

- 6.2 Confident in distinguishing 'expected and appropriate behaviour' from 'concerning, problematic or inappropriate behaviour' – both in themselves and others.
- 6.3 Empowered to confidentially share any low-level concerns with the SLT or Trust Board.
- 6.4 Able to interpret the sharing of low-level concerns as a neutral act.

By doing these things the Trust will:

- 6.5 Identify and address any 'concerning, problematic or inappropriate behaviour' identified as a low-level concern, including any patterns.
- 6.6 Support any individual member of staff by discussing and positively influencing any 'concerning, problematic or inappropriate behaviour' they might have shown at an early stage.
- 6.7 Respond sensitively and proportionately to the handling of low-level concerns when they are raised.
- 6.8 Be able to identify any weaknesses in its safeguarding system.

7 What is a Low-Level Concern?

- 7.1 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 Trust may have acted in a way that:
 - 7.2 Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work *and*
 - 7.3 Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).
 - 7.4 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 Trust policy.
 - ✓ Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
 - ✓ Humiliating pupils.
 - 7.5 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.
 - 7.6 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.
 - 7.7 Throughout the Trust, it is crucial that all low-level concerns are shared responsibly with the SLT or Trust Board, recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the Trust from becoming the subject of potential false low-level concerns or misunderstandings.

8 Avoiding Low-Level Concerns

8.1 The Trust recognises that education and regular reinforcement is key to our staff avoiding situations where low-level concerns might arise.

Therefore, the Trust will ensure new staff are clear about what allegations, low-level concerns and appropriate conduct are as set out on the Spectrum Of Behaviour Diagram during their induction.

8.2 The Trust will reinforce messages for all staff through regular education and training sessions, underpinned by our policies and procedures.

9 Spectrum Of Behaviour Diagram

See the Spectrum Of Behaviour Diagram below for more information on how low-level concerns compare to allegations and 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; 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.

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 set out above. 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 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, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

10 Reporting Low-Level Concerns

- 10.1 Low level concerns about a member of school staff should be reported to the Headteacher.
- 10.2 Low level concerns about a member of the Trust's staff should be reported to the Chief Executive Officer ("CEO") or Chief Finance & Operations Officer ("CFOO").
- 10.3 If the low-level concern is about the CEO this should be reported to the Chair of the Trust Board.
- 10.4 Low-level concerns about supply staff, contractors and local authority staff visiting should be reported to their respective employers through the SLT.

11 Assessing The Report Of A Low-Level Concern

- 11.1 Where a low-level concern is raised, information about this must be recorded and passed to the SLT **who** will make an assessment to determine if the matter is a 'low-level concern' or an 'allegation' or actually 'appropriate conduct' and therefore not a concern, see the Spectrum Of Behaviour Diagram above. The Trust will subsequently do one of the following:
 - ✓ Allegations that meet the harm threshold will be referred to the LADO for advice.
 - ✓ Low level concerns that the Trust feels may need further guidance will be referred to the LADO for advice.
 - ✓ Low level concerns that the Trust feels they can deal with internally will be dealt with through the Trust's child protection investigation process.
 - ✓ The Trust will engage with HR professional support from Browne Jacobson LLP where it is necessary to undertake further investigation and/or deal with the low-level concern under relevant HR policies and procedures.
 - ✓ There will be no further action taken where the concern raised was deemed to be appropriate conduct.
- 11.2 If you are still concerned or feel that your initial report has not been handled in a satisfactory manner, you may share your concerns direct with the LADO.

12 Recording Low-Level Concerns

- 12.1 All low-level concerns raised at the Trust should normally be recorded by members of staff in writing. If the low-level concern is about the CEO this should be reported to the Chair of the Trust Board.

Note: if a member of staff wishes they can report a low-level concern verbally but the person receiving the report must record the conversation as soon as possible afterwards in writing.

- 12.2 A low-level concern record will include:

- ✓ Details of the low-level concern.
- ✓ The context in which the low-level concern arose.
- ✓ Details of the investigation undertaken.
- ✓ Any actions taken, decisions made and outcomes.
- ✓ The name of the individual sharing the details of the low-level concern should be noted, although if they wish to remain anonymous then that will be respected as far as reasonably possible.

12.3 To comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), records of low-level concerns will be confidential and held securely in the relevant HR / personnel files.

13 Reviewing Low-Level Concerns

13.1 A record of any low-level concerns raised with the Trust should be reviewed on a termly basis by the SLT and discussed with the Trust Board so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

13.2 If a pattern of concerning, problematic or inappropriate behaviour is identified, the CEO or Trust Board will decide on the appropriate action to take. For example:

- ✓ Seek advice from HR professional support, Browne Jacobson LLP.
- ✓ Undertake a disciplinary investigation and/or proceedings.
- ✓ Make recommendations for the member of staff concerned to receive training.
- ✓ Where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, the CEO will make a referral to the LADO.
- ✓ Review policies and training.
- ✓ Review the wider organisational culture at the Trust to determine if any action needs to be taken to minimise the risk of a similar pattern of concerning, problematic or inappropriate behaviour happening again.

14 References

14.1 Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.