



Low Level Concerns Policy

ALLEN EDWARDS PRIMARY SCHOOL



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Low-Level Concerns Policy

Introduction:

At Allen Edwards Primary School, 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.

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 should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

Keeping Children Safe in Education 2022:

423. As part of their whole school or college 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.

424. 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:

- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and 99
- 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?

425. 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 pupils.

426. 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.

427. 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.

428. It is crucial that all low-level concerns are shared responsibly 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.



Clarity around Allegation Vs Low-Level Concern Vs Appropriate Conduct:

Storing and use of Low-Level Concerns and follow-up information:

Low-Level Concerns' forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the safeguarding 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 Head Teacher 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 Allen Edwards, 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

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.

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



Process to Follow when a Low-Level Concern is Raised:

<p>Share concern with head teacher. If the concern is about the head teacher, share with the chair of governors.</p>	<p>Complete a Low-Level Concerns (LLC) Form</p>			
<p style="text-align: center;">↓</p>				
<p>The headteacher should speak to the person who raised the LLC (unless raised anonymously).</p>	<p>→</p>	<p>Review information and determine whether behaviour:</p> <p>(a) is entirely consistent with the organisation’s staff code of conduct and the law</p> <p>(b) constitutes a LLC</p> <p>(c) is 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</p> <p>(d) when considered with any other LLCs that have previously been raised about the same individual, could now meet the threshold of an allegation, and should be referred to the LADO/ other relevant external agencies</p> <p>(e) in and of itself meets the threshold of an allegation and should be referred to the LADO/ other relevant external agencies.</p>	<p>→</p>	<p>Headteacher to make appropriate records of all internal and external conversations, their determination, the rationale for their decision, and details of any action taken, and to retain records in accordance with LLCs policy</p>
<p>The headteacher will speak to any potential witnesses (unless advised not to do so by the LADO or relevant agencies, where contacted).</p>				<p>Headteacher to consider whether concern also potentially raises misconduct or capability issues – taking advice from HR on a named or no-names basis where necessary – and, if so, to refer matter to HR</p>
<p>The headteacher will speak to the person whom the LLC has been raised (unless advised not to do so by the LADO or relevant agencies, where contacted).</p>			<p>→</p>	
<p>Where in any doubt the headteacher will contact the LADO – on a no-names basis if necessary.</p>				



Appendix One:

Low Level Concerns Form

Please use this form to share 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 Allen Edwards 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.

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). The record should be signed, timed and dated.

Remember that a low-level concern is different to an allegation.

Name of adult writing this concern: _____

Name of adult whom this concern is about: _____

Date written: _____

Signature: _____

Please write your concerns below (continue overleaf):
