



Low Level Concerns Policy

ALLEN EDWARDS PRIMARY SCHOOL

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Low-Level Concerns Policy

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.

Introduction

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- › Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff
- › Disclosure made by a child, parent or other adult within or outside the school
- › Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- › Being overly friendly with children
- › Having favourites
- › Taking photographs of children on their mobile phone that is not in line with the school's policy

- › Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- › Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff 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
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

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

Do not discuss with another colleague. Share concern with head teacher. If the concern is about the head teacher, share with the chair of governors.	Complete a Low-Level Concerns (LLC) Form			
↓				
The headteacher should speak to the person who raised the LLC (unless raised anonymously).		Review information and determine whether behaviour:		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
The headteacher will speak to any potential witnesses (unless advised not to do so by the LADO or relevant agencies, where contacted).	→	(a) is entirely consistent with the organisation's staff code of conduct and the law	→	
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).		(b) constitutes a LLC		
Where in any doubt the headteacher will contact the LADO – on a no-names basis if necessary.		(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	→	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
		(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		
		(e) in and of itself meets the threshold of an allegation and should be referred to the LADO/ other relevant external agencies.		

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- › Directly to the person who raised the concern, unless it has been raised anonymously
- › To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- › Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- › Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- › Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Staff References

We will not include low-level concerns in references unless:

- › The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- › The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

References

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance2020.pdf>

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):
