

Low Level Concerns Policy & Guidance



Upper Beeding Primary School

1. Introduction

At Upper Beeding Primary School, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We identify any concerning, problematic or inappropriate behaviour early, in order to minimise the risk of abuse. We ensure that adults working in, or on behalf of our school, are clear about professional boundaries and act within these boundaries, in accordance with our school ethos.

This policy should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies.

2. 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 colleague, volunteer, contractor or who, on reflection, recognises that their own actions could have been viewed as a risk, should inform the Head Teacher about their concern using a Low-Level Record of Concern Form (at the end of this policy). If the Head Teacher cannot be contacted, the DSL should be contacted instead. If the Head Teacher's conduct is a matter of concern, the Chair of Governors should be informed.

3. Keeping Children Safe in Education September 2023

The following is taken from Keeping Children Safe in Education September 2023 and identifies what may be considered behaviour relating to low level concern:

What is a low level concern (LLC)?

427. 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;*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,*
- *humiliating children*

428. 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.

429. 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

430. It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and 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 potential false allegations or misunderstandings.

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who 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 he or she 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:

Any adult linked to our school who has behaved 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 LADO.

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

5. Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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 as per section 7&8 of this policy
- 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

6. Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

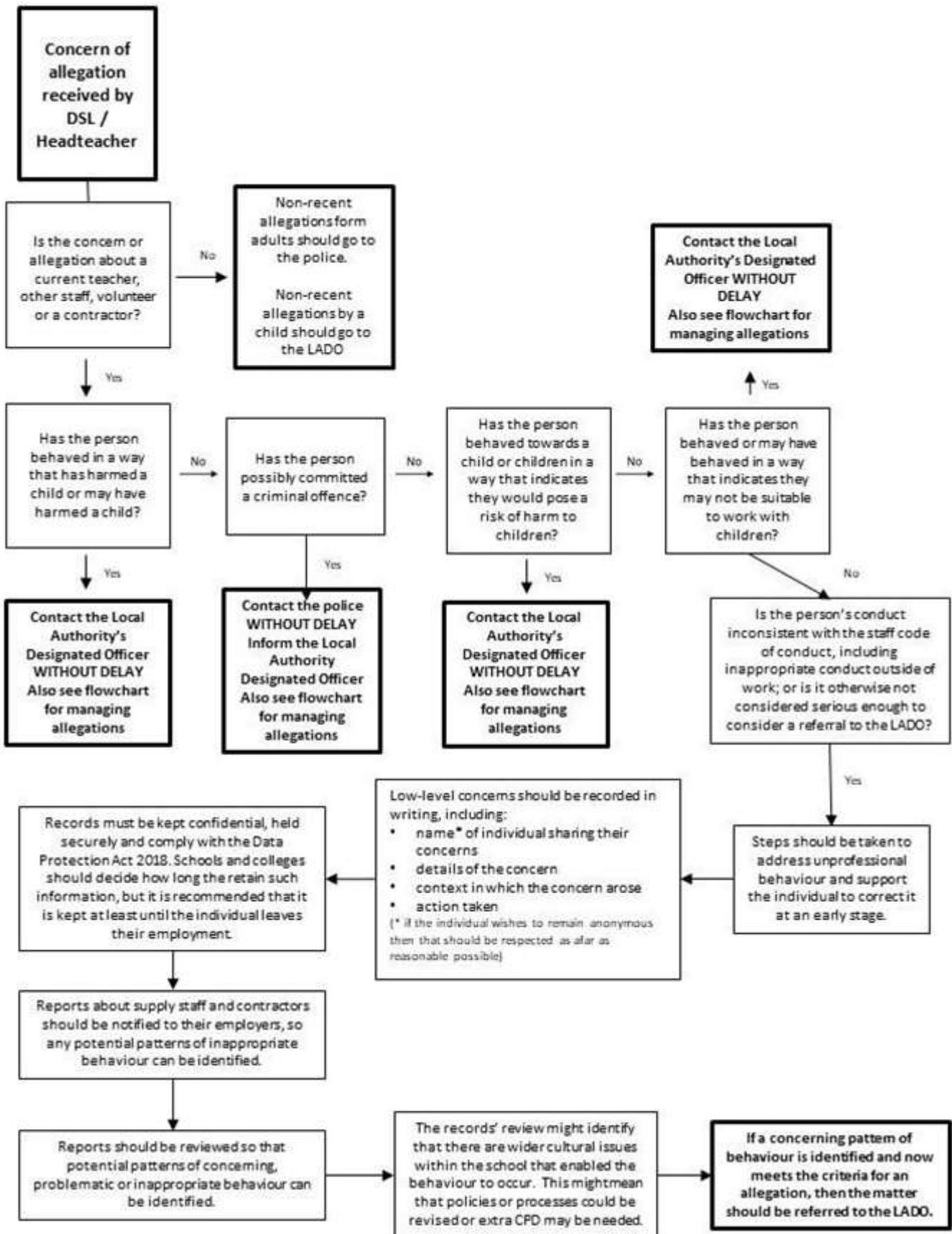
The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher, or those aware in the senior leadership team.

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 Upper Beeding Primary School, 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 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

7. Process to follow when a Low-Level Concern is raised



*NB – if the concern is about the Headteacher, then the Chair of Governors should be informed.

8. Low level Concerns Reporting Form – Upper Beeding Primary School

Your details		
Name		
Role		
Date and time of completing this form		
Details of concern		
Details of any children or young people involved		
Name(s)		
Next steps		
Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you feel is relevant to the processing of this concern.		
Signature		

For use by HT/safeguarding team upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow-up.	

Developed/updated by: Matt Andrews

Date: 30th October 2023

Date agreed by Gobs: 1st November 2023

Next review due by: 1st November 2024