

## Low Level Concerns Policy

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Approved By:

FGB

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## Introduction

At Sholing Infant 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. All staff were reminded of their role in reporting any concerns during the safeguarding training in September 25. This policy should be read in conjunction with our safeguarding policy and our staff code of conduct.

At Sholing Infant School, we aim to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This will enable us to:

- identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse
- 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.

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 children.

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.

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. At Sholing Infant School, low level concerns should be shared with the DSL, Lisa Houghton and in her absence Trevor Steward, DDSL.

Staff are encouraged to self-report any low level concerns to the DSL, for example, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns are reported to HAMWIC trust using the online reporting template.

Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves



from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO

The headteacher will be the ultimate decision maker in respect of all low-level concerns, but if the headteacher has any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they will consult with their LADO.

Should the low-level concern be regarding the headteacher, the Chair of governors should be contacted or Ruth Davies -safeguarding lead at HAMWIC..

### Responding to low-level concerns

If a concern has been raised via a third party, the headteacher will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken on the HAMWIC reporting form.

## Clarity around Allegation vs Low-Level Concern vs 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;
- 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.



## **Storing and use of Low-Level Concerns and follow-up information**

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

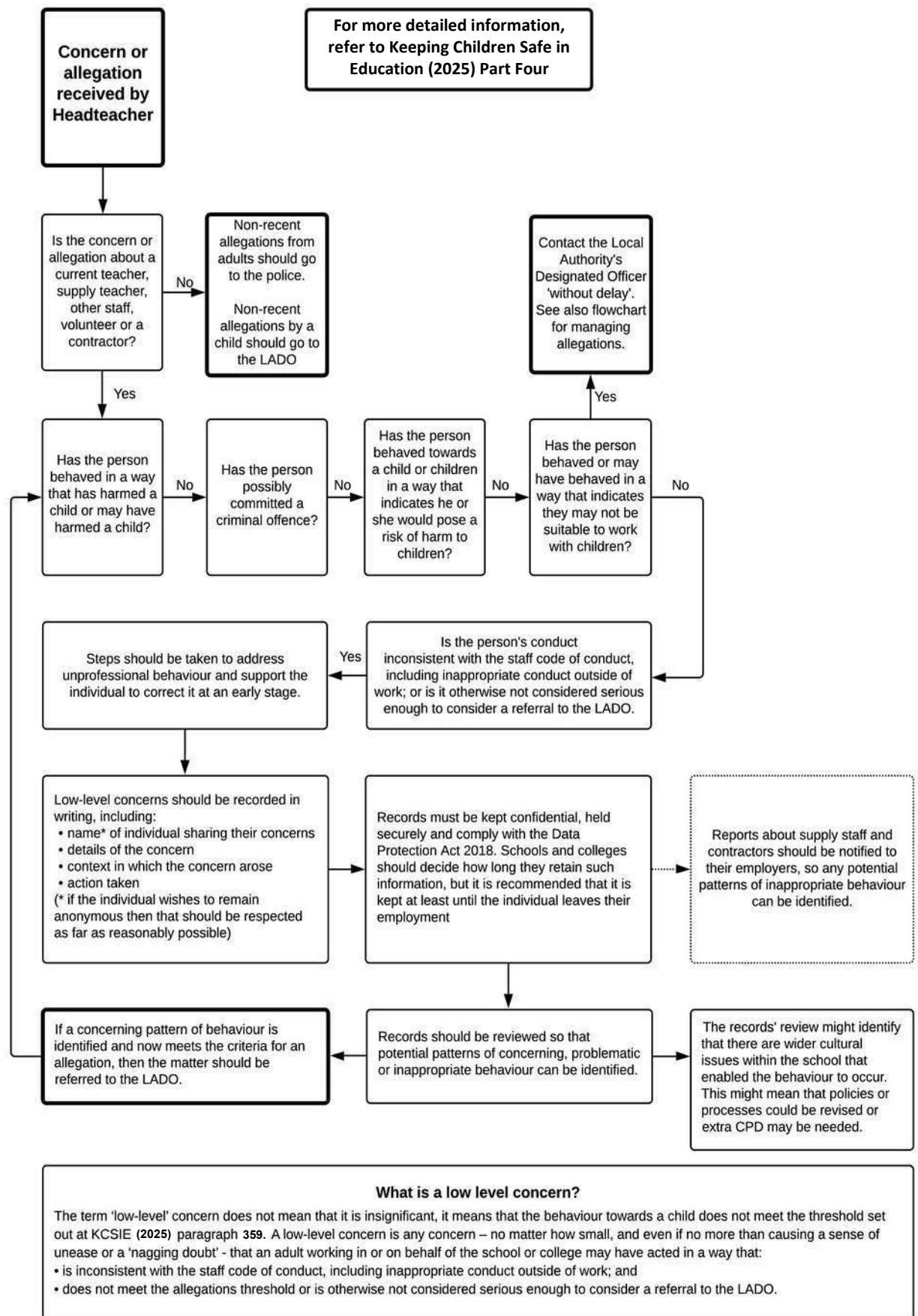
The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or Deputy Head teacher, in her absence.

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.

KCSIE makes clear that 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.



## Process to follow when a Low-Level Concern is raised






## Key Reference Document

More detailed guidance and case studies on low-level concerns can be found in: Developing and implementing a low-level concerns policy: a guide for organisations which work with children (farrer.co.uk).

## Low Level Concern Reporting

Reporting is via the HAMWIC intranet:

### Quick Links

[Hamwic Incident/Accident System](#)



HAMWIC  
EDUCATION  
TRUST

## Incident Reporting System

### Important Note:

Please use this form to report incidents to the trust. Your Headteacher or other nominated person will also see this report. In an emergency or time critical situation always use the published Hamwic contact telephone numbers to reach somebody directly.

### School

Select school where incident occurred, or associated school if reporting incident outside school.

Select School



### Type of Incident

Please select the type of incident being reported. If a single incident involves multiple types select the first to occur.

Select Incident Type

