

Federation of St Charles and St Mary's Catholic Primary Schools



Low-Level Concerns Policy

Date policy reviewed by the Governing Body: Autumn 2024
Date policy to be reviewed: Autumn 2027

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Low-Level Concerns Policy

1. Introduction

At St Mary's Catholic 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.

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

3. What 'Keeping Children Safe in Education' says about Low-Level Concerns

The following is taken from Keeping Children Safe in Education September 2024

424. 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.

425. 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 enable schools and colleges to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse, and 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?

426. 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,**
- **humiliating children.**

427. 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.

428. 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.

429. 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.

4. 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.

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

LLC 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 Executive Head Teacher, Head of school or those aware in the Safeguarding 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 St Mary's 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:

- 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;
- if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

6. Key Reference Documents

For more information on Low Level Concerns, use the links below.

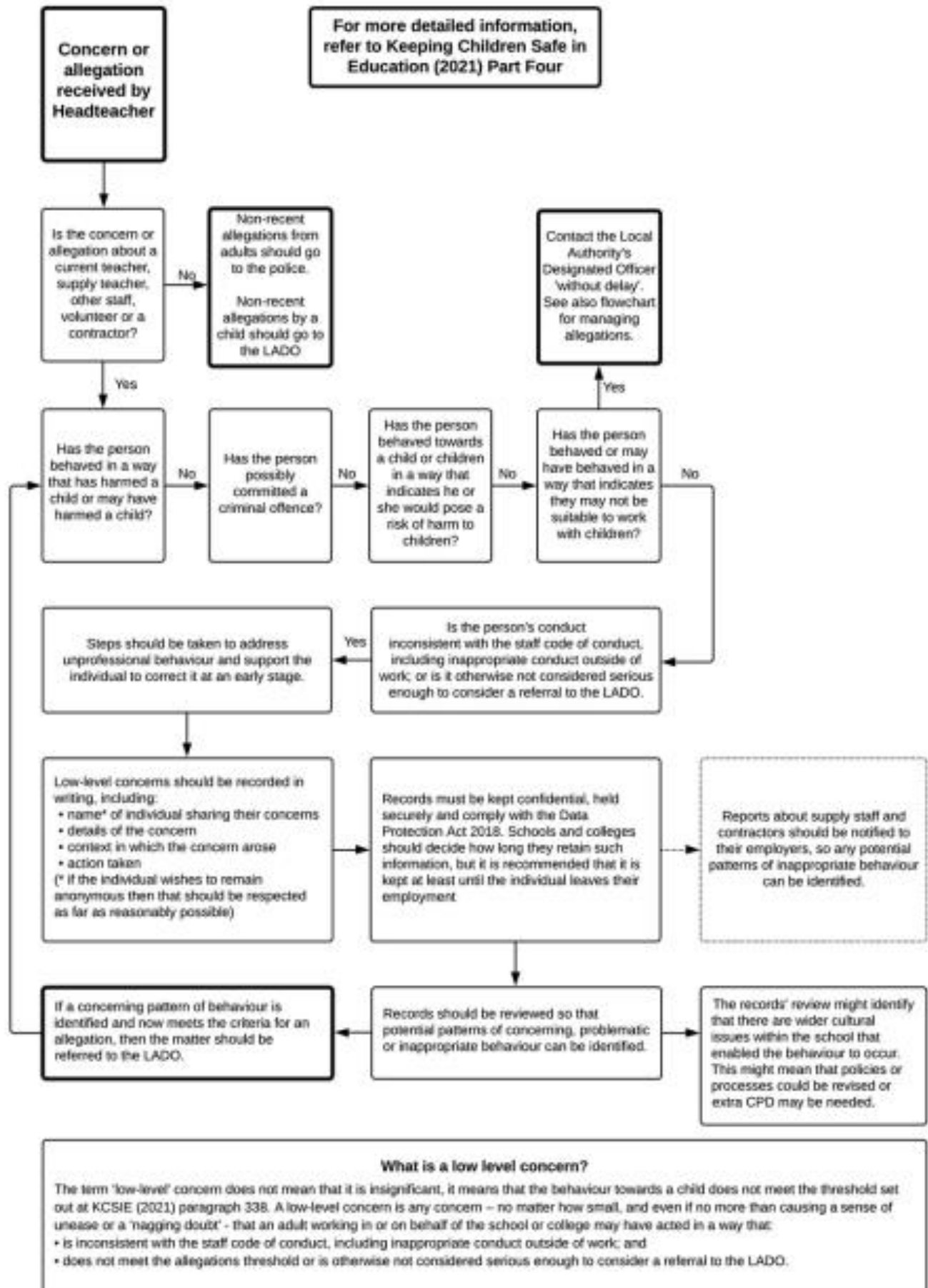
NSPCC advice

<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education#:~:text=Schools%20should%20have%20a%20low,conduct%20for%20staff%20and%20volunteers>

Full copy of Keeping Children Safe in Education – September 2022

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf

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



8. Low Level Concern Form



Low Level Concern Reporting Form

Your details		
Name		
Role		
Date and Time of completing this form		
Details of individual (including yourself for self-reporting) whom the concern is about		
Name		
Role		
Relationship to the person reporting e.g. Manager, colleague		
Details of concern		
<p>Please, include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</p>		
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 the appropriate	Yes	No
Please state any other information that you feel is relevant to the processing of this concern		
Signature:		

9. Low Level Concern Follow-up Form



Low Level Concern Follow-up Form

For us by Headteacher/Safeguarding Team upon receipt of concern	
Date and time concern was received	
Signature	
Role	
Actions to be taken and follow-up	