



# Low-Level Concerns Policy

Southwold Primary School

<b>Approved by Governors:</b>	25 <sup>th</sup> June 2024	
<b>Signature of Governor:</b>	Name: Kathryn Truman	Signature: <i>K. Truman</i>
<b>Next Review Date:</b>	25 <sup>th</sup> June 2025	

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## 1. Introduction

At Southwold 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 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.

## 3. Keeping Children Safe in Education September 2023

The following is taken from Keeping Children Safe in Education September 2023

*425. As part of their whole school 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.*

*426. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) 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 concerning, problematic or inappropriate 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?**

*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 allegations threshold or is otherwise not considered 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.*

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.

430. 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 potential false low-level concerns or misunderstandings.

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

### Concern or allegation that may meet harm threshold

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; 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 they 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

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 with children may have acted in a way that:

- is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

### Appropriate conduct

Behaviour which is entirely consistent with the organisation’s staff code of conduct, and the law.

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

Low level concern forms and follow-up information will be stored securely within the schools 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.

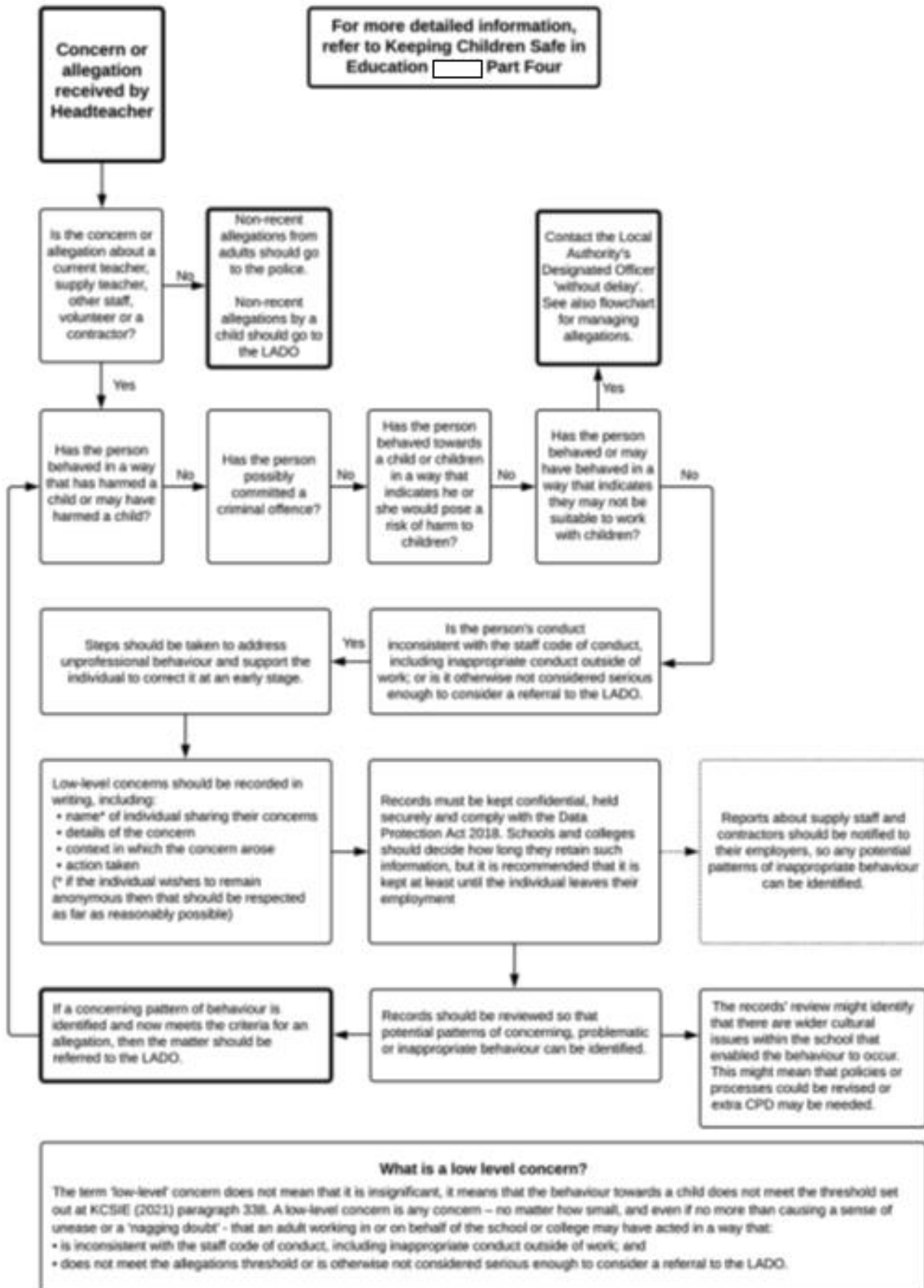
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Southwold 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.

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



## 7. Key Reference Document

Read this document for further information about Low-Level Concerns.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

## 8. Low Level Concern Form

This form will be available to staff via:

- The School Office have blank copies
- DSLs have blank copies
- The Senior Leadership Team have blank copies

# Reporting 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 Southwold Primary School staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

You should provide a concise record (online/electronically or hard copy) – 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.

Name of person raising concern:		Report submitted anonymously			
Role: (eg. Parent, teacher, child, TA)					
Date:		Time:			
Present:					
Meeting		Telephone Call		Other	
Details of the Concern					
Context in which the concern arose					
Signed	Person raising concern (if not anonymous)				
Concern Received by:		At: (time)		On: (date)	
Action Taken					
Follow Up Notes					
Signed	Headteacher or Chair of Governors				

*This record will be held securely in accordance with Southwold Primary School low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Southwold Primary School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.*