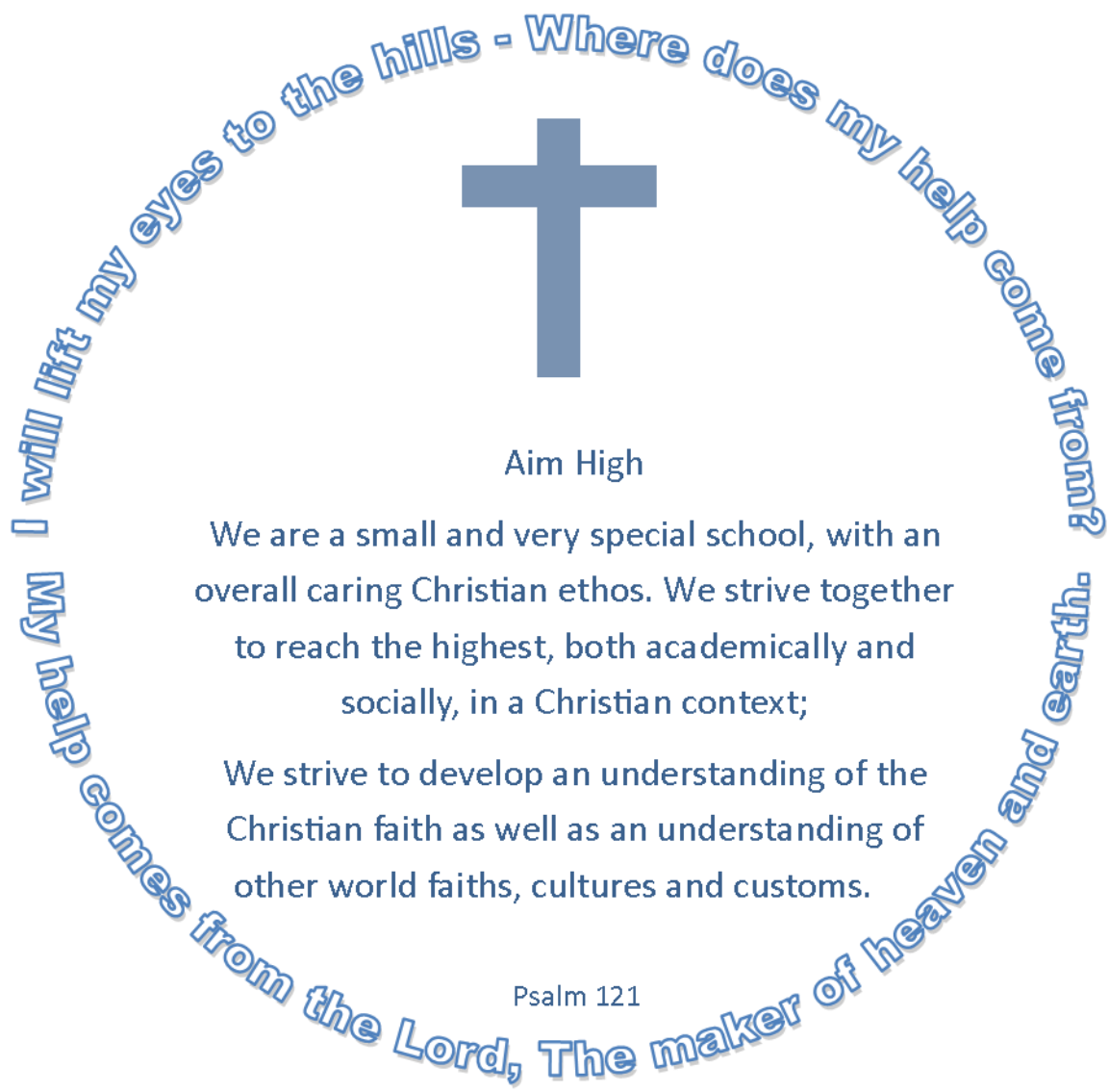


# **Managing Low Level Concerns Policy**



## **Clive Church of England Primary School and Nursery**

**Date of last review: November 2022**  
**Date for next review: November 2023**



***Respect, Responsibility, Resilience***

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## **Introduction**

At Clive CE Primary School, we understand that safeguarding is the most important aspect of our job. 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.

## **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 Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Chair of Governors, Mark Haines-Eynon, should be contacted instead.

## **Keeping Children Safe in Education September 2021**

The following is taken from Keeping Children Safe in Education September 2021

*407. 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.*

*408. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part 4 - Section one of KCSiE 2021) 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?**

*408 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 of KCSiE 2021. 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 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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

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 any such concerns, including those which do not meet the harm threshold (see KCSiE 2021, 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.

### **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 has acted in a manner which;

- Is not consistent with an organisations Code of Conduct, and/or
- Relates to that conduct outside of work which, even if not linked or a particular act or omission, has caused a sense of unease of the 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**

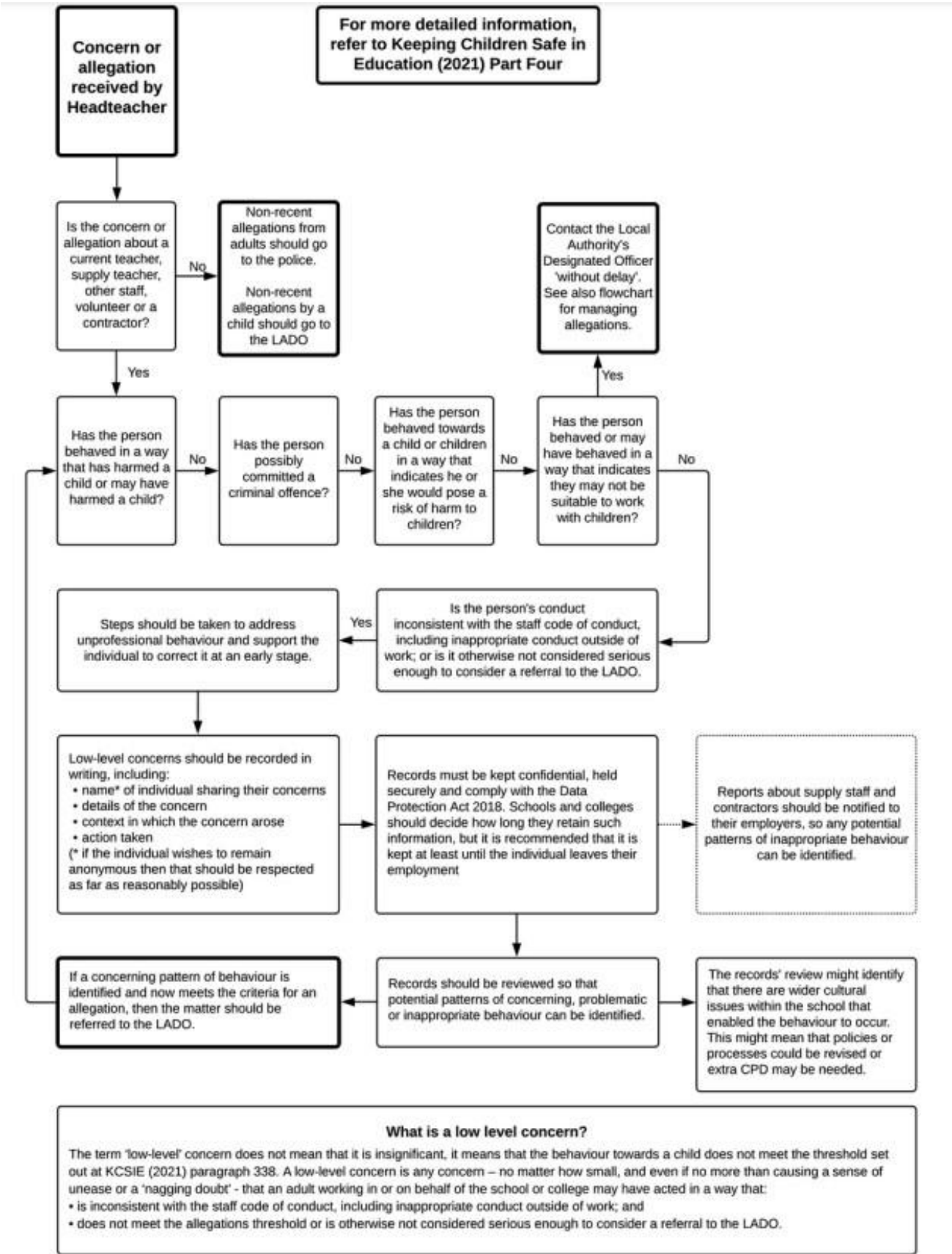
LLC forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the senior leadership team. This will be stored in accordance with the school's GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or the Designated Safeguarding Lead.

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 Clive CE 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.

**Process to follow when a Low-level Concern is raised**



## **Key Reference Document**

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2021. <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-levelconcerns-guidance-2020.pdf>

## **Low Level Concern Form**

This form will be available to staff via:

- A member of the Senior Leadership Team
- Appendix A of this policy



**Low-Level Concern reporting form**

Name of adult sharing the concern:	
Name of adult concern is about:	
Date and time of concern being share:	
Referrer signature and date:	
Receiver Signature and date:	
<p>Details of concern:</p> <p>Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:</p> <ul style="list-style-type: none"> <li>• is not consistent with Clive CE Primary School Code of Conduct, and/or;</li> <li>• 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.</li> </ul> <p>Share your concerns with the Headteacher as soon as possible having recorded them on this form. If the concern is about the Headteacher, please pass it onto the Chair of Governors in a sealed envelope via the school office.</p> <p>Remember, a low-level concern is different to an allegation.</p> <p>See the table on the reverse for a definition:</p>	
Action taken:	