



Horsington Church School  
"That they may have life, Life in all its fullness."  
John 10:10



## **Low -Level Concerns policy**

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### **1.Introduction**

At Horsington church 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 MAT staff Code of Conduct. This policy sets out the 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 a 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 using the Low-Level Record of Concern form. If the Head Teacher is not available, the Chair of Governors should be contacted instead.

### **3. Keeping Children safe in Education September 2022**

#### **Low-level concerns**

*423. 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.*

*424. 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:*

- encourage an open and transparent culture*
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early*
- minimise the risk of abuse, and*



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• 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?**

425. 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 pupils.

426. 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.

427. 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.

428. 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:

- Behave in a way which 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 harm to children



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#### **Low-Level concern**

Any concern-no matter how small, even if it no more than a ‘nagging doubt’

- Is not consistent with the organisation’s Code of Conduct, and/or
- Relates to their conduct outside school 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

### **5. 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 system, with access only by the leadership team. This will be in accordance with GDPR policies.

The member of staff reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or 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, any record of low-level concerns which are stored about them will be reviewed as to whether or not the 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, inline with 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.

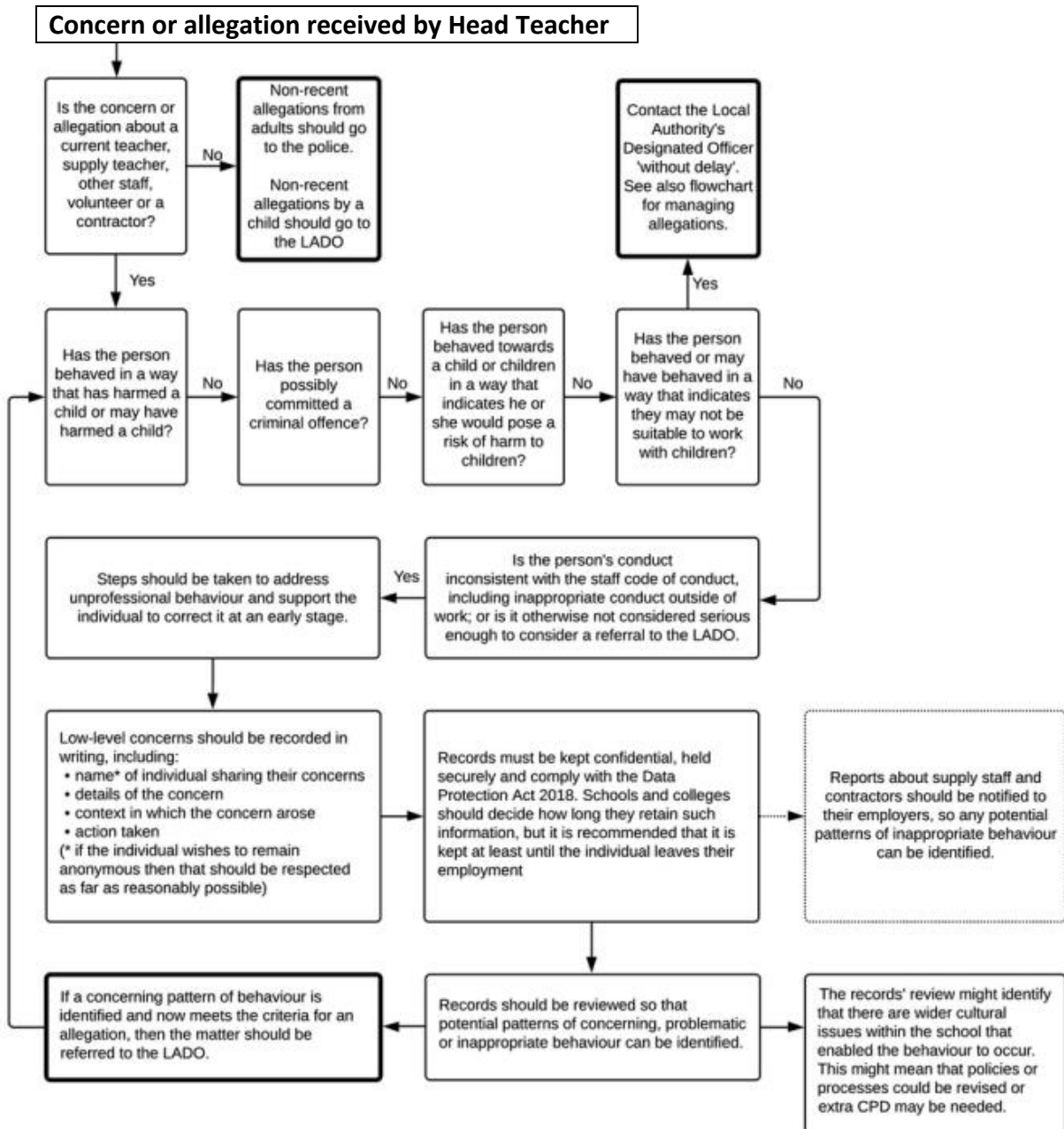


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### 6. Process to follow when a low-level concern is raised.



#### What is a low-level concern?

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- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
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## 7. Key Reference Document

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2022\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)

## 8. Level Concern Form

Your details	
Name ( optional)	
Role	
Date and time of completing this form	
Details of the individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern, e.g. Colleague	
Details of the concern	
<p><b>Please include as much detail as possible. Think about the following:</b> 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 Code of Conduct? Or other school policies or procedures?</p>	

*This form is available in the staff drive/safeguarding/Low-Level concern  
From the Office*



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## Appendix A

### Low-Level Concern Form

Thank you for reporting your concerns. Please fill in the form below and return it directly to the Head Teacher or DSL. Please refrain from discussing this concern with anyone other than the head Teacher or DSL. We ask that you keep all details confidential.

<b>Your details</b>	
<b>Name ( optional)</b>	
<b>Role</b>	
<b>Date and time of completing this form</b>	
<b>Details of the individual whom the concern is about</b>	
<b>Name</b>	
<b>Role</b>	
<b>Relationship to the individual reporting the concern, e.g. Colleague</b>	
<b>Details of the concern</b>	
<p><b>Please include as much detail as possible. Think about the following:</b> 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 Code of Conduct? Or other school policies or procedures?</p>	