



# Low Level Concerns Policy

*Wisdom for life*

<b>Level of Delegation:</b>	Trustees	<b>Approval date:</b>	25/03/2022
<b>Last reviewed on:</b>	March 2022	<b>Next review due:</b>	March 2023
<b>Based on:</b>			

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## 1. Introduction

At Bishop Otter Academy Trust, 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. This policy aims to create and embed a culture of openness, trust and transparency in which our school's values are constantly lived, monitored and reinforced by all staff.

## 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 or a member of the Senior Leadership Team 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 2021

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

338. This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors 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 he or she 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.

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 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.

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

409. 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 [. 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.

410. 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.

411. 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.

412. It is crucial that any such concerns, including those which do not meet the harm threshold (see 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.

## 4. Defining ‘Allegation’, ‘low level concern’ and appropriate conduct

### 4.1. 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.

### 4.2. 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.

### 4.3. 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

Low-Level concerns should be recording in writing (no CPOMS deemed necessary by a DSL or Deputy DSL). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Where possible, low-level concerns should be recorded on a form – see Annex 2 (alternatively, a blue ‘concern slip’ can be used if necessary).

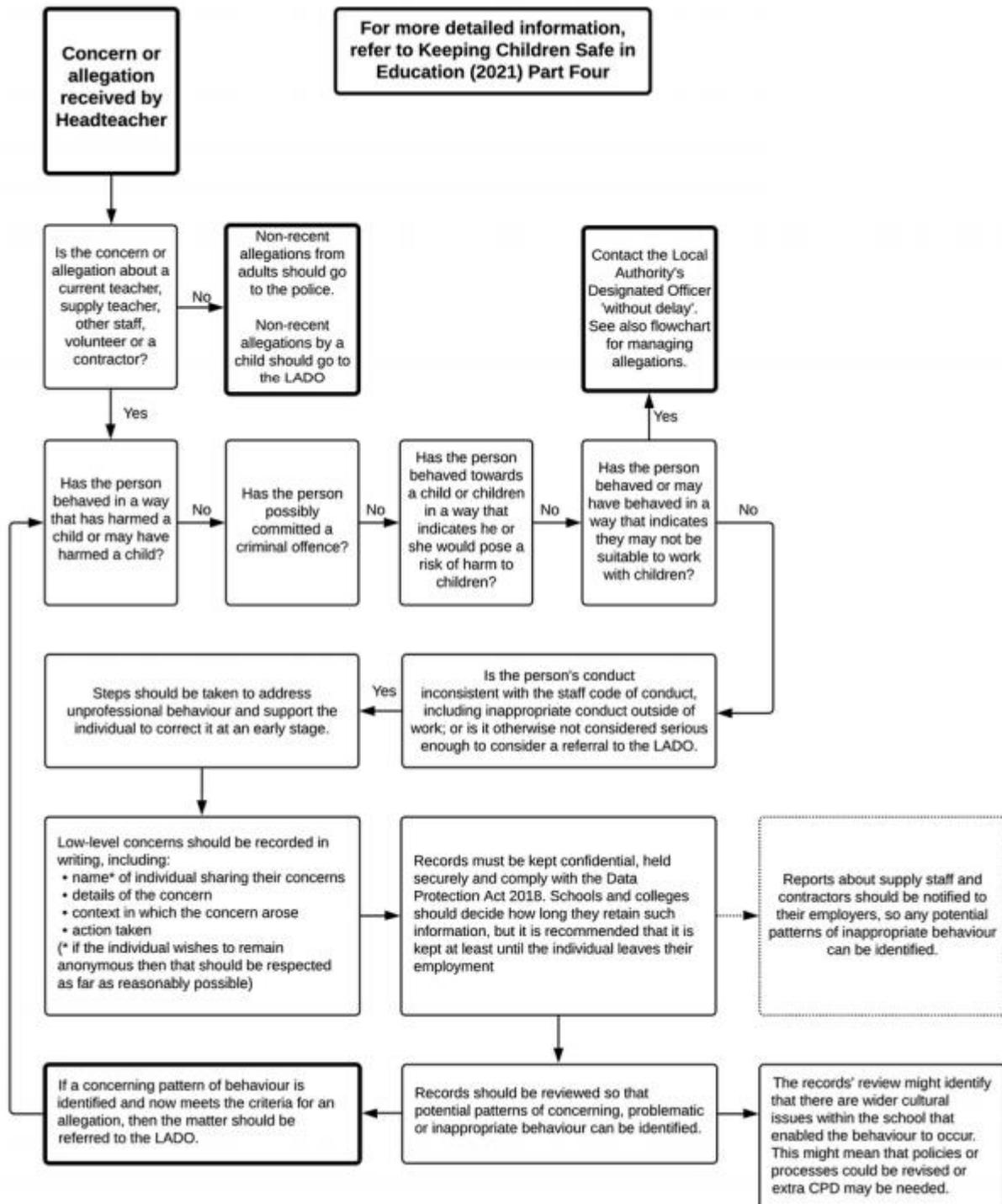
If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses.

Low-Level concerns and follow-up information will be stored securely, in writing, within the schools safeguarding systems in a ‘low-level concerns’ central record 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. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to

whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

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 The Bishop Otter Academy Trust, 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 raising low level concerns



## 7. Key information

### 7.1. Reference documents

[Further information about Low-Level Concerns referenced in KCSIE 2021.](#)

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

# Child Protection Information

ST NICOLAS & ST MARYS

## Worried about a child?

Any “Child Protection” concerns must be reported to the **Designated Safeguarding Lead (DSL) who is Mr Andy Lincoln** (Acting Headteacher).

If he is unavailable, please speak to a Deputy DSL: Miss Hannah Wing, Mrs Victoria Bishop or Mr David Etherton

Concern or “worry” slips/logs are available from the school office and staff room to record concerns, however minor.

**If in doubt – please report!**

*Updated Sept 2021*

## Child Protection Policy

The school’s Child Protection Policy is based on the West Sussex County Council model and is available from the school office, the school website or on this notice board.

*Updated Sept 2021*

## West Sussex Multi-Agency Integrated Front Door (Formerly MASH)

**Anyone with concerns about a child’s welfare can contact IFD:**

Tel: 01403 229900 (5pm-8am weekdays) Tel: 0330 2226664 (Out of hours)

Email: [WSChildrenservices@westsussex.gov.uk](mailto:WSChildrenservices@westsussex.gov.uk)

*Correct Sept 2021*

If you believe a child is in immediate danger you must call the police on 999

## Local Authority Designated officer (LADO)

Consultation or seeking advice please call the duty number

Tel: 0330 222 6450 (9am-5pm) Email: [LADO@westsussex.gov.uk](mailto:LADO@westsussex.gov.uk)

*Correct Sept2021*

## Safeguarding in education Team

*Correct Sept 2021*

Call: 03302 224030 Email: [Safeguarding.Education@westsussex.gov.uk](mailto:Safeguarding.Education@westsussex.gov.uk)

### **Early Help Hubs**

All 6 hub contact details are found here:

<https://www.westsussex.gov.uk/social-care-and-health/social-care-and-health-information-for-professionals/children/early-help/contact-details/> *Correct Sept 2021*

### **Sussex Child Protection and Safeguarding Procedures**

This school adheres to Sussex Child Protection and Safeguarding Procedures.

Web: <https://sussexchildprotection.procedures.org.uk/> *Correct Sept 2021*

### **NSPCC whistleblowing advice**

Staff can call 0800028 0285 (8am-8pm weekdays)

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Web: <https://learning.nspcc.org.uk> *Correct Sept 2021*

# Child Protection Information

ST ANDREW'S CE PRIMARY SCHOOL

## Worried about a child?

Any "Child Protection" concerns must be reported to the **Designated Safeguarding Lead (DSL) who is Mrs Jenny Wise** (Acting Head of School).

If she is unavailable, please speak to a Deputy DSL: Mrs Rachel Mullis or Mr David Etherton

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## ANNEX 1 – List of suggested policies to support Reporting of Low Level Concerns

The following policies support the safeguarding framework in our setting.

This list is not a definitive/exhaustive list and should be tailored to reflect your individual setting.

<b>Policy</b>
Child Protection Policy
Staff Behaviour / Code of Conduct
Confidential Reporting
Safer Recruitment
Equality / Anti-discrimination
Use of physical intervention
Meeting the needs of pupils with medical conditions – including intimate care (Statutory Guidance 2015)
Providing First Aid
Drug and substance misuse (DfE guidance 2012 <a href="#">Click here</a> )
Educational / Offsite / Residential
Behaviour Management
Health & Safety
Use of Photography
Disciplinary Policy
Complaints
Appraisal Policy
GDPR and data protection policy

## ANNEX 2 – RECORDING FORM

**Please ask for a copy of the school’s recording 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 the schools staff code of conduct, including inappropriate conduct outside of work,
- and does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

<b>Name of adult whom this concern is about</b>	
<b>Date and time written:</b>	
<b>Name and role of person raising concern:</b>	
<b>Signature:</b>	

<b>Details of concern (where? when? what? who? Why do you feel the person is acting in a way that is contrary to Code of Conduct?)</b>
You should provide a concise record - including brief context in which the low-level concern arose, and details which are chronological and as precise and as accurate as possible – of any such concern and relevant incident(s). Please use a separate sheet if necessary.

<b>Actions taken</b>			
<b>Date</b>	<b>Person taking action</b>	<b>Action taken</b>	<b>Outcome of action</b>

**Name:**

**Designation:**

**Copied to:**