



Low Level Concerns Policy

September 2024

Introduction

This policy forms part of Sherdley Primary School. Staff Code of Conduct and should be read in conjunction with the school's Safeguarding Policy. The Low Level Concerns Policy is based upon the statutory guidance 'Keeping Children Safe in Education 2024', the expectations within 'Guidance for Safer Working Practice 2019' and the principles within Farrer & Co's 'Developing and Implementing a Low Level Concerns Policy 2022'. These documents are referenced throughout the policy.

Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, and recorded and dealt with appropriately, is crucial. If implemented well, this should:

- encourage an open and transparent culture
- enable our school 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 are clear about professional boundaries and act within them, in accordance with the ethos and values of Sherdley Primary School

Behaviour which is not consistent with the standards and values of Sherdley Primary School and which does not meet the schools expectations encapsulated in our staff code of conduct, needs to be challenged.

Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse. Where a concern about an individual's behaviour meets the threshold of an allegation, clear guidance exists to support the member of staff is responding to these concerns.

It is important to recognise that, in practice, the words 'allegation' and 'concern' can be and are used interchangeably by different people. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable), or, on the other, it does not meet the harm threshold (in which case it should be treated as a low-level concern). So, the focus should not be on the language used by the person disclosing it; the focus should, instead, be on the behaviour being described.

Purpose of a Low Level Concerns Policy

This policy enables all staff to share any concerns (including allegations) which **do not** meet the harm threshold.

This policy outlines the processes in place to manage and record these low-level concerns and take appropriate action to safeguard children.

Safeguarding and promoting the welfare of children is everyone's responsibility.

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

In order to achieve this purpose, Sherdley Primary School will:

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
- empower staff to share any low-level concerns using an agreed, clear to understand procedure
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised;

Allegation that may meet the harm threshold

The term 'allegation of harm' means that it is alleged that a person 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.

These incidents are NOT low-level concerns and will be dealt with in line with KCSIE Part Four.

Concern that does not meet the harm threshold: Low-level concern

KCSIE states that, as part of their whole school approach to safeguarding, schools 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.

The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above.

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 an organisation's 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 – but may merit consulting with and seeking advice from the LADO.

Examples of such behaviours 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
- carrying, or cuddling children unnecessarily
- humiliating pupils – which could include the use of derogatory, sexualised, offensive and/or intimidating language

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 the organisation; or as a result of vetting checks undertaken.

A culture of vigilance and staff training on low level concerns

Sherdley Primary School ensures that a culture of openness and trust is fostered within the organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

At Sherdley Primary School there is a commitment from leadership to adhere to, enforce and reinforce the staff code of conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status. Staff are briefed on the staff code of conduct and low level concerns policy so that everyone is familiar with it, and clear on the standard of behaviour expected of them – it is a lived document; seen to apply to all staff, volunteers, visitors and governors.

Sharing Low Level Concerns

It is important to us at Sherdley Primary that we have appropriate policies and procedures in place to manage and record any such concerns and take the appropriate actions in order to safeguard effectively.

Sherdley Primary uses the StaffSafe aspect of CPOMS as a way for staff to record any concerns, including self-referrals, and a back-up system involves the use of a paper report which should be passed onto the DSL Jill Stroud or Cath Eccleston/DDSLs Katie Bennett, Matt Davies, Emily James- in order for it to be added into the online system.

APPENDIX A outlines the Flow Chart which is used to deal with concerns once raised and received.

Recording low-level concerns

The Staffshare aspect of CPOMS is the method used by Sherdley for recording, and storing any low-level concerns. This system meets the requirements of the Data Protection Act 2018 and the UK General Data Protection Regulation.

If staff cannot access the system, they can record their concerns using a paper format – See **APPENDIX B** - which will be uploaded to the above StaffSafe CPOMS system.

Either of the systems should record details of the concern, it's context and then allow for actions to be recorded in relation to the concern/allegation.

The name of the individual sharing their concerns should also be noted, however if the individual wishes to remain anonymous then this should be respected as far as reasonably possible.

Records will be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold; in which case it will be referred to the LADO (Local Authority Designated Officer).

Storing and use of low-level concerns and follow-up information

KCSIE is clear that low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, e.g. misconduct or poor performance.

Low-level concerns which relate to supply staff and contractors will be notified to their employers.

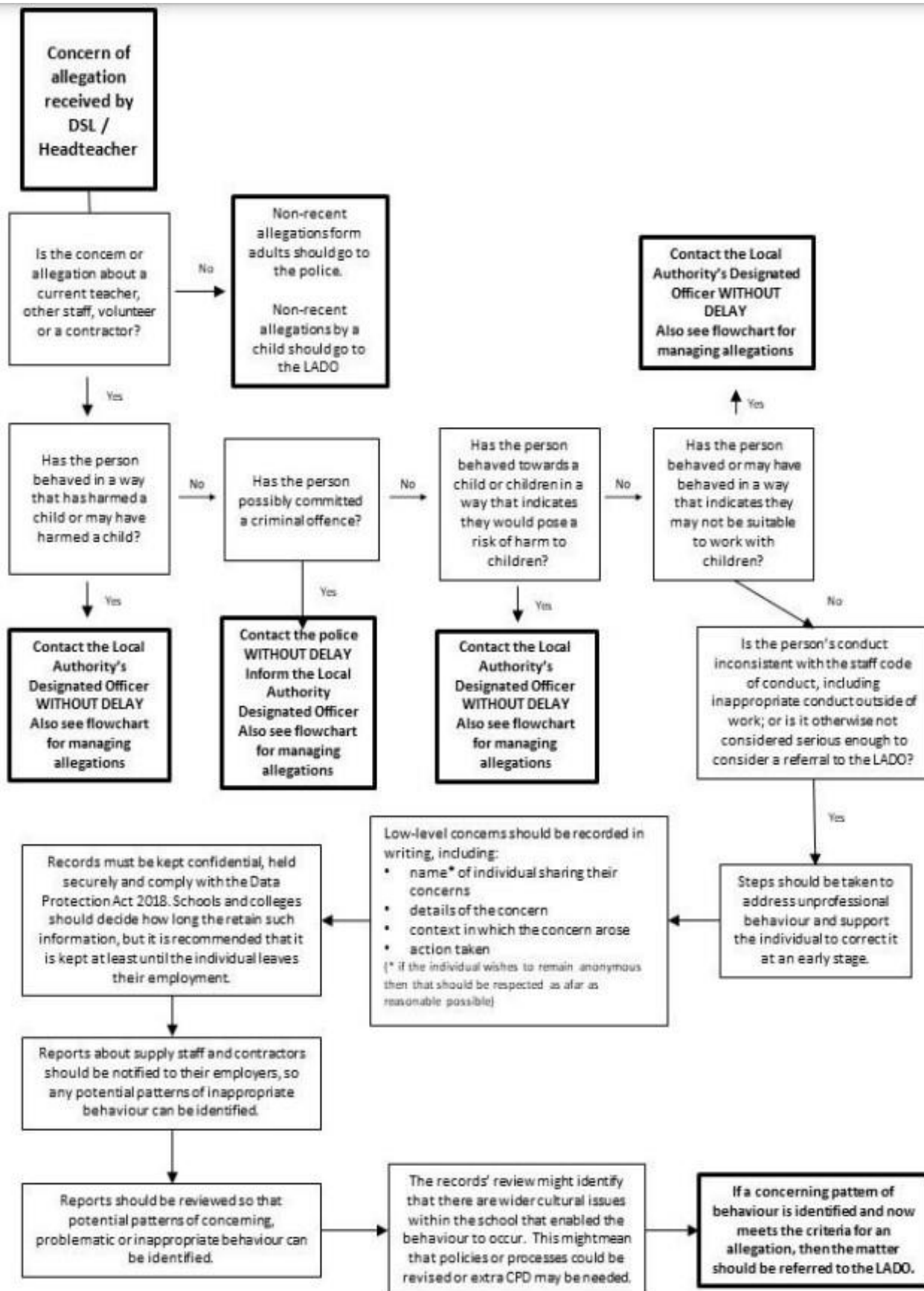
Whenever staff leave Sherdley Primary, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information need to be kept. Consideration will be given to:

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

Policy created September 23/updated October 24

Review Autumn 25

APPENDIX A



APPENDIX B

LOW-LEVEL CONCERN FORM

If you are unable to access the online StaffSafe version of CPOMS, or would prefer for your concern to remain anonymous (please be mindful that for a thorough investigation, depending on the nature of the concern, the details of the referrer could be valuable) you can record your concerns on this sheet.

All concern forms should be handed to either Jill Stroud or Cath Eccleston (DSL), Katie Bennett, Matt Davies or Emily James (DDSLs) who will upload the form to the CPOMS system in order to comply with GDPR regulations.

Name of person completing concern form : (optional)	
Role in school :	
Date/Time of completing this concern form :	
This next section is for details of individual (including self if this is a self-report) whom the concern is about	
Name :	
Role :	
Relationship to the individual reporting e.g. colleague, manager	
Details of the concern	
<p>Please include as much detail as possible. Consider the following : What behaviour and/or incident are you reporting? What EXACTLY did you see/hear happen? Where did the incident take place, and where were you located? Why did/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>	
<p>Please continue on additional paper if needed and attach to this incident form.</p>	

Details of any children or young people involved		
Name(s)		
Next Steps		
Are you willing to meet with the Headteacher/DSL to discuss your concern?	YES	NO
Signature (optional) :		

For use by Safeguarding team at Sherdley upon receipt of concern		
Date and time concern form received		
Signature/Name of receiver		
Role		
Actions to be taken:		INITIALS
Details of form read	YES	
Form uploaded to CPOMS StaffSafe	YES	
Once form has been uploaded to StaffSafe on CPOMS all further recording of action and incident will take place using the online system.		