



# Southridge First School

## Low Level Concerns Policy Framework

September 2023

**DRAFT**

Date of Adoption by the Governing Body:	Autumn 2023
Date of future review:	Autumn 2025

## **Terms used in this document**

- **ALL** is noted as meaning – all staff, supply staff, agency workers and volunteers (including Governors).
- DSL-Designated Safeguarding Lead
- DDSL(s)-Deputy Safeguarding Lead(s).
- LADO (Local Authority Designated Officer)

## **Low Level Concerns Policy**

At Southridge First School, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse and ensure that all people working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos.

This policy should be read alongside:

- Keeping Children Safe in Education September 2021
- Safeguarding and Child Protection Policy September 2021
- Staff Code of Conduct Policy September 2021

It may be possible that a member of staff acts in a way that does not cause risk to children but the behaviour is still inappropriate. A member of staff who has a concern about:

- another member of staff, supply staff, agency workers and volunteers (including Governors).
- their own actions, which on reflection, could have been viewed as a risk to children

should inform the Headteacher about their concern using a Low-Level Record of Concern Form (Appendix A).

If the Headteacher cannot be contacted, the Chair of Governors should be contacted instead. Contact details for both the Headteacher and Chair of Governors, can be found by visiting [www.southridgefirst.org.uk](http://www.southridgefirst.org.uk) or by accessing the Safeguarding and Child Protection Policy September 2021, Reference Document A. If your issue was in relation to the Headteacher and Chair of Governors, you should contact the Local Authority Designated Office (LADO) through the Front Door Service on 0345 2000 109.

Once the Low-Level Concern Form has been received by the Headteacher or Chair of Governors, they will follow the process set out in Appendix B.

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

The following is taken from Keeping Children Safe in Education September 2021 and identifies what may be considered behaviour relating to low level concern:

What is a low level concern (LLC)?

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 of Keeping Children Safe In Education September 2021 (detailed on page 3 of this policy in the red box).

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
- does not meet the allegations threshold or is otherwise not considered serious enough for 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 of Keeping Children Safe in Education September 2021 - 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.

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

	<b><u>What action should you take?</u></b>
<p><b><u>Allegation</u></b></p> <p>Any adult linked to our school who has:</p> <ul style="list-style-type: none"> <li>- behaved in a way that has harmed a child, or may have harmed a child and/or;</li> <li>- possibly committed a criminal offence against or related to a child and/or;</li> <li>- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or;</li> </ul>	<p>Depending on the severity of the allegation you can contact:</p> <ul style="list-style-type: none"> <li>- the DSL or Deputy DSL</li> <li>- the Headteacher</li> <li>- the Front Door Service</li> <li>- the Local Authority Designated Officer (LADO) through the Front Door service.</li> <li>- the police</li> </ul> <p><b>Please see the list of up to date contact</b></p>

<ul style="list-style-type: none"> <li>- behaved or may have behaved in a way that indicates they may not be suitable to work with children.</li> </ul>	<b>numbers in the Safeguarding and Child Protection Policy September 2021, Reference Document A</b>
<p><b><u>Low-level concern</u></b></p> <p>Any adult linked to our school who has behaved in a way that:</p> <ul style="list-style-type: none"> <li>- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and</li> <li>- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.</li> </ul>	<ul style="list-style-type: none"> <li>- inform the Headteacher using the Low-Level Record of Concern Form (Appendix A)</li> <li>- If the concern was in relation to the Headteacher, you can inform the Chair of Governors</li> <li>- If the concern was in relation to both the Headteacher and Chair of Governors, contact the LADO through the Front Door Service</li> </ul> <p><b>Please see the list of up to date contact numbers in the Safeguarding and Child Protection Policy September 2021, Reference Document A</b></p>
<p><b><u>Appropriate:</u></b></p> <p>Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.</p>	<p>No action needed.</p>

**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 Headteacher 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 Southridge First School, any record of low-level concerns which are stored 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

## Appendix A



### Southridge First School

#### Low-Level Concern Record Form

This form is to be completed alongside the Low-Level Concern Policy Autumn 2023. 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:

- is not consistent with the school’s code of conduct
- 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.

**Please speak with the Headteacher as soon as possible.** It is also helpful to document your concerns, which can be done using this form and then passed to the Headteacher. If your concern is in relation to the Headteacher, please contact the Chair of Governors. Further information and contact details can be found in the Low-Level Concern Policy September 2021.

<b>Name of adult writing the concern:</b>	
<b>Name of adult whom this concern is about:</b>	
<b>Date written:</b>	
<b>Signature:</b>	
<b>Please write your concerns below (continue overleaf if needed)</b>	

## Appendix B

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

