

PERRYFIELDS PRIMARY PRU



LOW LEVEL CONCERNS POLICY

| Review Date | Reviewed Date | Reviewer (Who?) | Approved By Name and Date |
|---------------------|--|--|---|
| October 2022 | Developed and Reviewed September 2022 | Safeguarding DSL Safeguarding Governor | Management Committee 04.10.2022 |
| October 2023 | Reviewed Sept 2023 | Safeguarding DSL | Management Committee 17.10.2023 |

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| Minutes Reference | |
| Signature of Chair | |

Introduction

In Perryfields Primary PRU 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.

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 (see Annex A). If the Headteacher cannot be contacted, the information should be reported to the designated safeguarding lead or deputy (the most senior person in this role). 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 for an allegation.

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headteacher will:

- Speak to the person reporting the concern to gather all the relevant information;
- Speak to the individual about the concern raised to ascertain their response.

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to witnesses. The outcome to the investigation will determine the action taken in accordance with the school's Code of Conduct and Managing Allegations policies.

The following is taken from ['Keeping Children Safe in Education September 2023'](#)

424. 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.

425. 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.

What is a low level concern?

426. 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 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;
- using inappropriate sexualised, intimidating or offensive language, or;
- humiliating children

427. 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.

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

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| <p>Allegation:</p> <p>Behaviour which indicates that an adult who works with children has:</p> <ul style="list-style-type: none"> • 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 in a way that indicates that they may pose a risk of harm to children. |
| <p>Low-Level Concern:</p> <p>Any concern – no matter how small, 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"> • is not consistent with the Trust’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. |
| <p>Appropriate conduct:</p> <p>Behaviour that is entirely consistent with the Trust Code of Conduct and the law.</p> |

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 Headteacher’s secure staff records. The only people with access to this will be the school Headteacher and DSL if necessary. 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 relate to issues that would normally be included in a reference (e.g. misconduct or poor performance) have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Perryfields, 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:

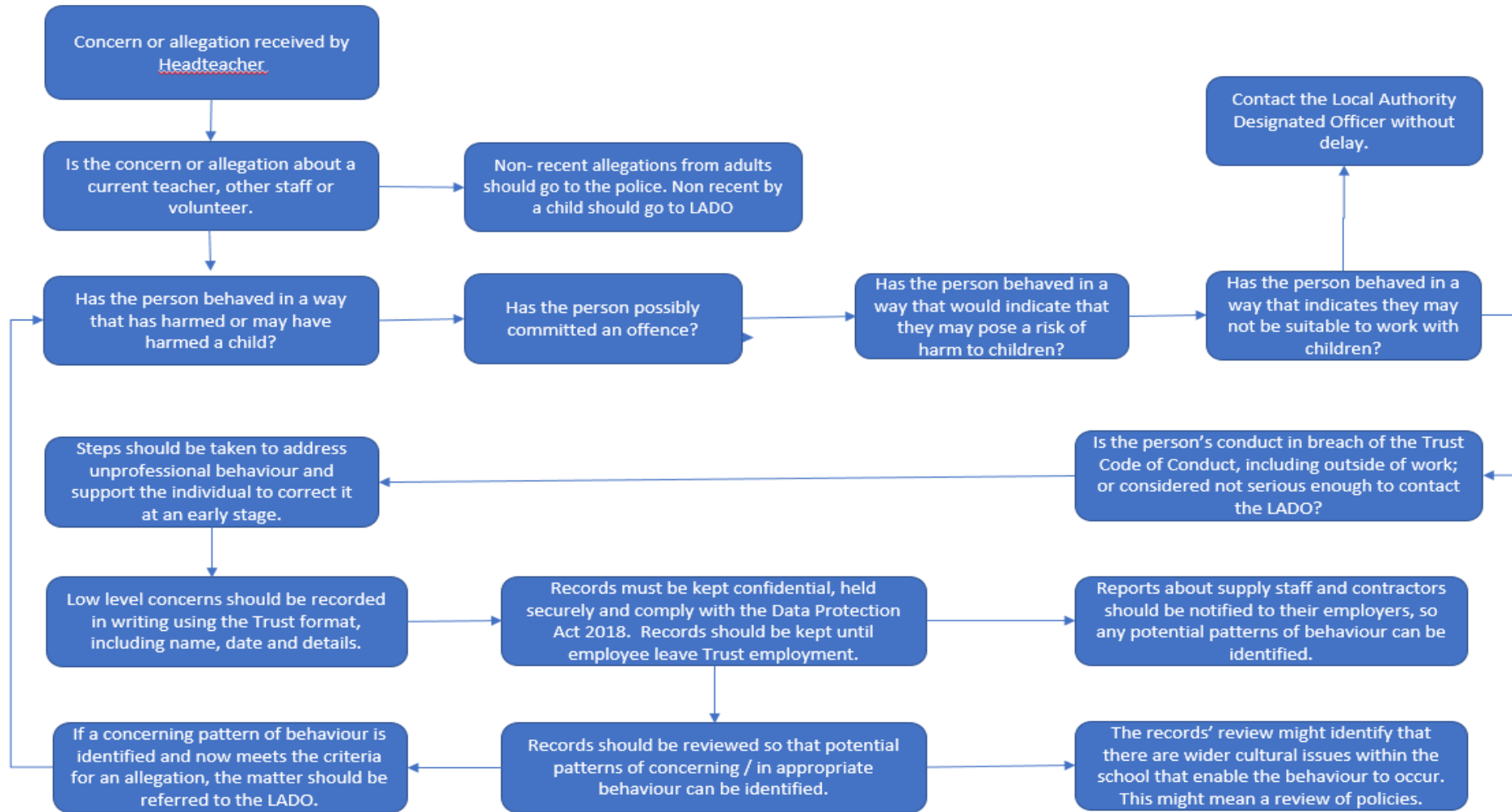
(a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

(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.

This policy links to the follow documents:

- Keeping Children Safe in Education 2023
- Safe Working Practice for Staff in Education Settings
- School based safeguarding policies
- School staff Code of Conduct
- Managing Allegations policy

Process to follow when a Low-Level Concern is raised



ANNEX B

Low Level Concern Report regarding a current member of staff

Please use this form to share a low level Concern. Where possible please speak with the Headteacher as soon as possible. If the concern is regarding the Headteacher, please pass your concerns to the Chair of Governors via office@perryfields.worcs.sch.uk

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 in a way that indicates that 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 may have acted in a manner which:

- Is not consistent with the Trust'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.

Appropriate conduct:

Behaviour that is entirely consistent with the Trust Code of Conduct and the law.

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|---|--|
| Name of adult writing this concern: | |
| Name of adult who the concern is about: | |
| Date: | |
| Signed: | |
| Concern: | |