

Ellwood Community Primary School

Believe, Achieve, Belong



Managing Low-Level Concerns

Date reviewed: March 2022

Next renew date: September 2022

Introduction

At Ellwood Community Primary 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 Staff Conduct and Whistleblowing Policy. 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, however it is inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher 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.

Keeping Children Safe in Education (September 2021)

In KCSIE [2021], paragraphs 407 and 408, it states that schools should have policies and procedures to deal with concerns (including allegations) that do not meet the harm threshold.

At Ellwood Community Primary School, our whole school approach to promoting wellbeing and safeguarding is reflected in our core vision of *Believe, Achieve, Belong*.

We expect all stakeholders and community members to uphold this vision and we will challenge any actions or concerns that do not meet this expectation.

We have a whole school approach to safeguarding and ensure that an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (Section 2, Part 4 KCSIE) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

Keeping Children Safe in Education [KCSIE]

What is a low-level concern?

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 of Unsubstantiated, Unfounded, False or Malicious.

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 Local Authority Designated Officer [LADO].

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.

It is crucial that any such concerns, including those which do not meet the allegation/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.

Examples of a low-level concern 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.

[KCSIE \[Paragraph 10\]](#)

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

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 he or she may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-Level Concern

- 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 manner which:

- Is not consistent with the school's core vision of believe, achieve, belong and our Staff Conduct Policy.
- 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 the adult's suitability to work with children.

Appropriate Conduct

- Behaviour which is entirely consistent with the school's core vision of showing respect for ourselves, each other and our environment.

Storing and use of Low-Level Concerns and follow-up information

Low-Level Concern forms and follow-up information will be stored securely by the Head Teacher.

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.

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 Ellwood Community Primary School, 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.

Process to follow when a Low-Level Concern is raised:

The flowchart below sets out the process for reviewing a Low-Level Concern.

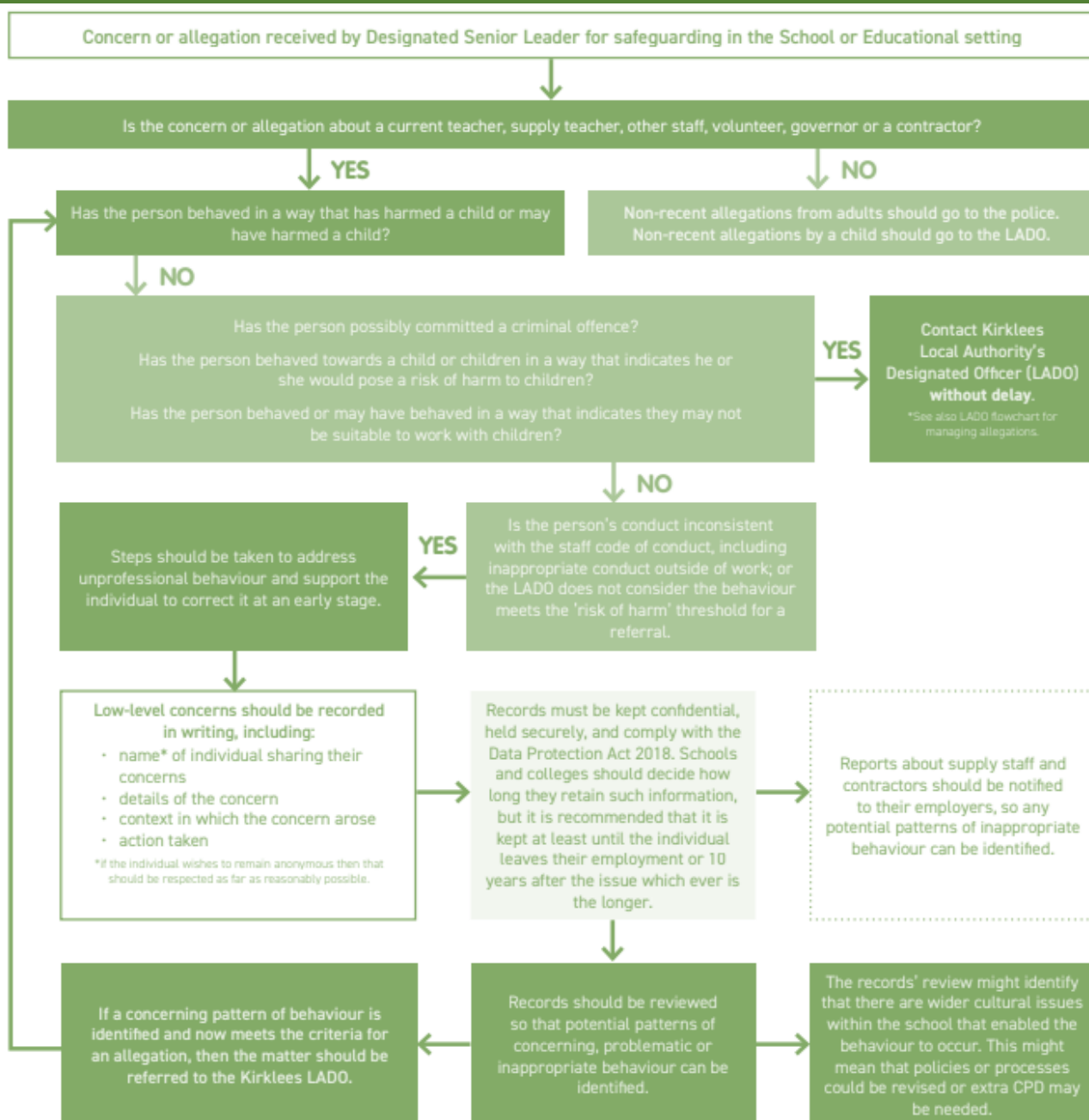
Low-Level Concerns should be recorded in writing on a LLC form (by the Head Teacher)

The Low-Level Concern form includes:

- Name of the individual sharing the concern*
- Details of the concern
- Context in which the concern arose
- Action taken

(*if an individual wishes to remain anonymous that that will be respected as far as possible)

The flowchart below outlines the action that will be taken following a concern or allegation being raised:



Sharing the Low-Level Concern

Handwritten concerns can be given to the Head Teacher.

Digital forms can be submitted via email (see below).

Mark as confidential to HT or Chair of Governors.

(Word documents: File: Protect Document: Encrypt with password: enter your password: repeat)

Send as an email to:

head@ellwood.gloucs.sch.uk

or, where there are concerns about the Head Teacher to;

chair@ellwood.gloucs.sch.uk

Storing the Low-Level Concern Forms

Low-Level Concern forms and follow-up information will be stored securely by the Head Teacher and be password protected.

Staff wanting to share a low-level concern can find the document below:

Paper copies for staff are in the staffroom.

Copies can be given on request.

Appendix 1: Low-Level Concern Form

Ellwood Community Primary School

Believe, Achieve, Belong

Low-Level Record of Concern

Record of Concern Form

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 Ellwood School’s core vision of *Believe, Achieve, Belong* and the Staff 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.

Where possible, please speak with the Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head Teacher.

Send as an email to head@ellwood.gloucs.sch.uk

If the concern is about the Head Teacher, please pass it onto the Chair of Governors or email them at chair@ellwood.gloucs.sch.uk

Digital forms can be submitted via email.

Ensure it is addressed as confidential

Remember, a low-level concern is different to an allegation See the table below for a definition: -

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 he or she may pose a risk of harm to children
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children

Low Level Concern

- 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 manner which:
- Is not consistent with the school’s core vision of Respect for ourselves each other and our environment and our Staff Conduct Policy
- 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 the adult’s suitability to work with children

Appropriate Conduct

- Behaviour which is entirely consistent with the school's core vision and aims of, Believe, Achieve and Belong

Name of adult writing this concern: _____

Name of adult whom this concern is about: _____

Date written: _____

Signature: _____

Please write your concerns below (continue overleaf) 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 accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). Consider any contextual information that may be appropriate to know.