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1. Introduction

At The Firs Lower School, we aim to create an open and transparent culture where any concerns about any of the 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 adults 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 our [Child Protection and Safeguarding Policy](#), Confidential Reporting (Whistleblowing) Policy, Allegations Against Members of Staff Policy and Staff Code of Conduct.

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, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk should inform the Head Teacher (DSL) about their concern using a Low-Level Record of Concern Form.

In the Head Teacher's absence, the Deputy Head (DDSL) should be contacted instead. If both Head and Deputy Head can not be contacted then another member of the Safeguarding Team should be approached.

3. Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2024 and identifies what may be considered behaviour relating to low level concern:

What is a low level concern (LLC) 433.

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 362.

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:

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- 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. (Local Authority Designated Officer)

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,
- humiliating children

434. 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.

435. Low-level 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 of the organisation; or as a result of vetting checks undertaken.

436. It is crucial that all low-level concerns are shared responsibly 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 becoming the subject of potential false low-level concerns or misunderstandings.

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who 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.

Low Level Concern:

Any adult linked to our school who has behaved 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.

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

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

Low Level Concern forms and follow-up information will be stored securely on the Safeguarding Team GDrive (only accessible by Safeguarding Team members).

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 Safeguarding Team. (Once the template has been completed and emailed to the DSL, the original **MUST** be deleted and not held in the personal drive of the referrer).

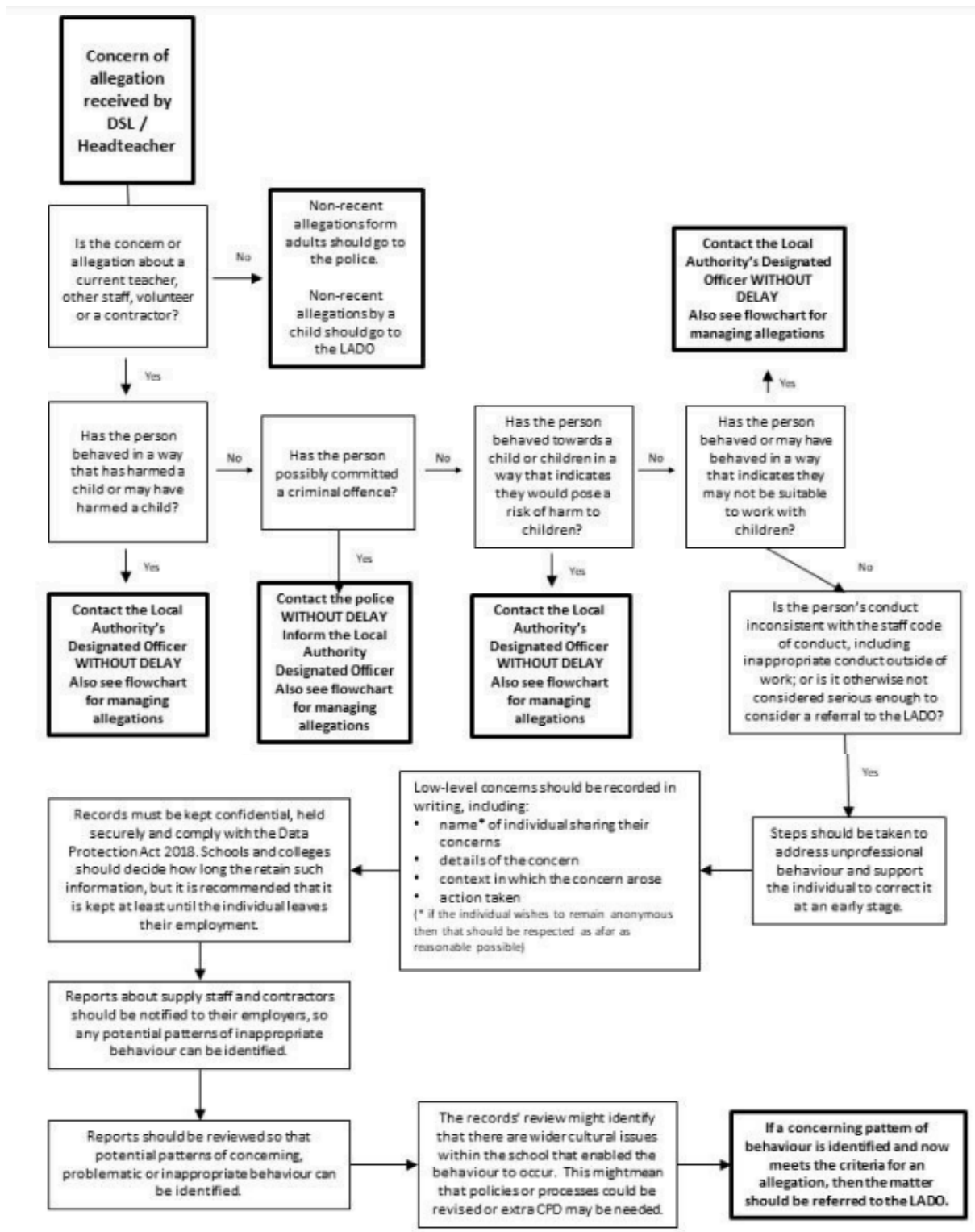
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns, resulting in disciplinary or misconduct procedures.

Whenever staff leave The Firs Lower 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

6. Process to follow when a Low-Level Concern is raised



When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and Allegations of Abuse against Staff as stated in Safeguarding (Child Protection) Policy (currently in force) cited in Keeping Children Safe in Education (KCSIE)], and protect the identity of all individuals to which the concern pertains as far as possible. Staff members may request anonymity when reporting a concern, and the school will endeavour to respect

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this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Confidential reporting (Whistleblowing) Policy, staff will be protected from potential repercussions caused by reporting a genuine concern. If the concern is about the Headteacher, then the Chair of Governors should be informed.

7. Low level Concerns Reporting Form

The [Low Level Reporting Form](#) should be used to report any 'low level concern'. Once completed, email / give to the DSL and delete the original from your Drive.

Your Details	
Name	
Role	
Date form completed	
Details of individual whom the concern is about	
Name	
Role	
Date concern arose	
Details of Concern	
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why 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>	
Actions taken - to be completed by the DSL	