



Low-Level Concerns Policy

Contents

1. Introduction	Page 1
2. Summary	Page 1
3. Keeping Children safe in education, September 2024	Page 2
4. Clarity around allegations vs low-level concerns vs appropriate conduct	Page 3
5. Storing and use of low-level concerns and follow up information	Page 3
6. Process to follow when a low-level concern is raised	Page 4
7. Key reference document	Page 5
8. Low-level concern form	Page 5
9. Managing Allegations Flow Chart	Page 7

1. Introduction

St Hilary's is an independent day school for girls and boys aged between 2 and 11 years old. It is a mixed ability, non-denominational school with a Family ethos that welcomes children from all backgrounds. We actively promote democracy, the rule of the law, individual liberty and respect those with different faiths and beliefs. These are fundamental British Values which underpin all that we offer, as does our School Motto 'Not for oneself but for all.'

At St. Hilary's, 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 Handbook (Staff Code of Conduct). This policy sets out the detail and processes for staff regarding low-level concerns they may have.

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 should inform the Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Chair of Governors should be contacted instead. The Headteacher will consult with the DSL, if the concern is deemed a possible risk to children. If the Low-Level Concern relates to the DSL, the Headteacher will refer directly to the Safeguarding Governor.

If the Headteacher cannot be contacted; the Chair of Governors should be contacted instead, via the Business Manager on bursar@sthilarysschool.com or the Head's PA on secretary@sthilarysschool.com.

3. Keeping Children Safe in Education September 2024

The following is taken from Keeping Children Safe in Education September 2023

407. 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.

408. 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?

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

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:

- a. is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- b. does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- c. being over friendly with children;
- d. having favourites;
- e. taking photographs of children on their mobile phone;
- f. engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- g. using inappropriate sexualised, intimidating or offensive language.

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 harm threshold (see Part Four - 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.

4. 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 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 an organisation’s 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.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

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

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Headteacher in the first instance. This will be stored in accordance with the school’s GDPR and data protection policies.

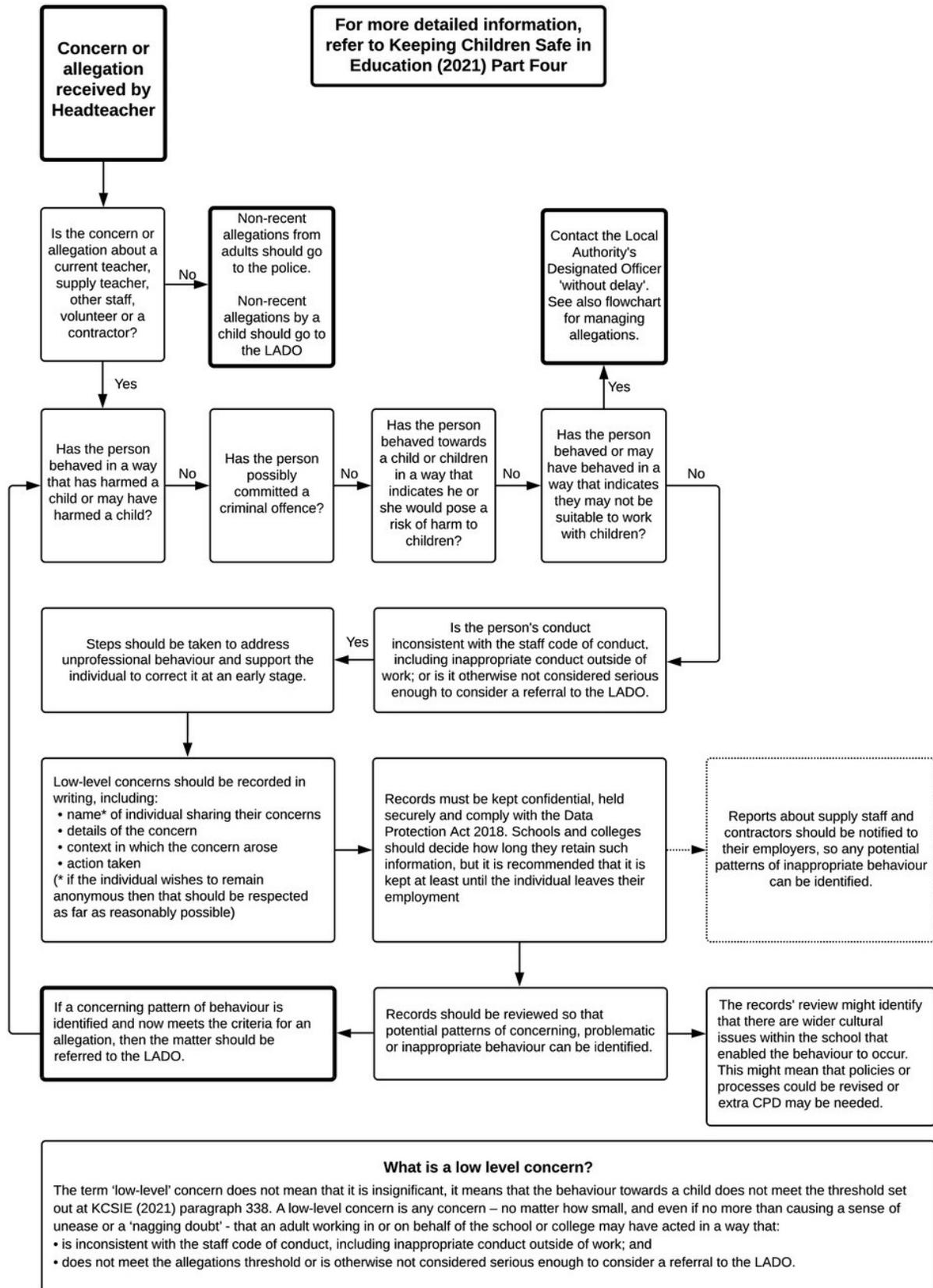
The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team (should they have needed to be informed).

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 St Hilary’s, 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 Key Reference Document



Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2023.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

7. Low Level Concern Form (Appendix 1)

This form will be available to staff via:

- a. Child Protection Proformas on the Internal Shared Network
- b. 'It Could Happen Here' Staff Display Board
- c. DSLs
- d. The Senior Leadership Team

Low-Level Record of Concern Regarding a Staff Member

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 St Hilary's's 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 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. When completed, please pass this form to the Headteacher. If the concern is about the Headteacher, please pass it onto the Chair of Governors or email them at chairofgovernors@sthilarysschool.com
Remember, a low-level concern is different to an allegation (which uses a different form). 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 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 an organisation's 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.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

Name of adult writing this concern:

Name of adult whom this concern is about:

Date written:

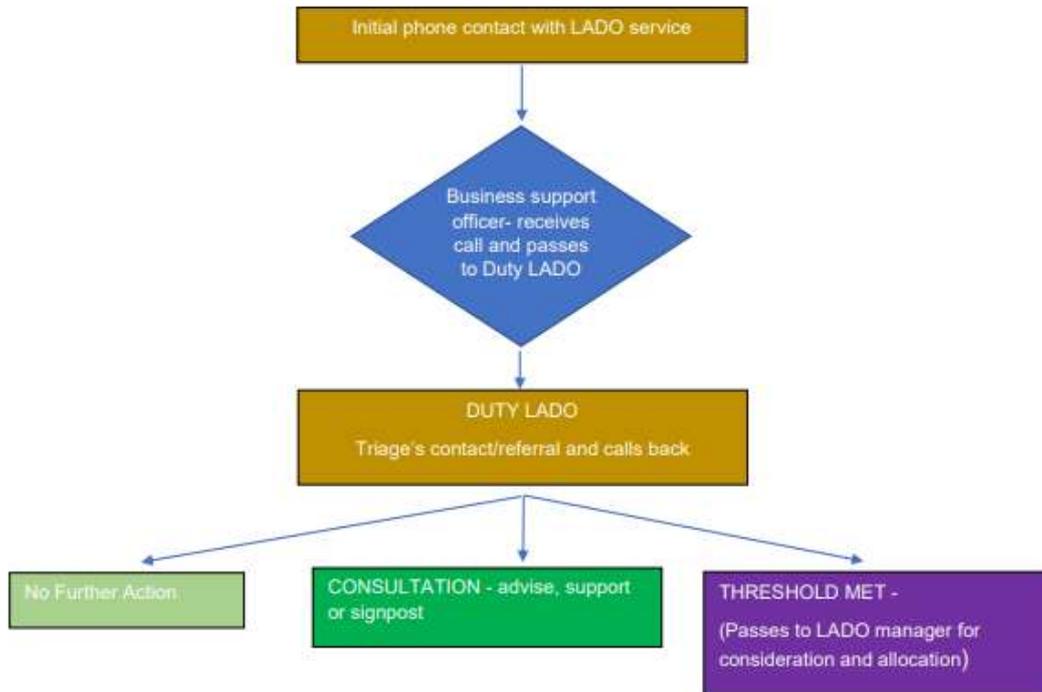
Signature:

Please write your concerns below (continue on a separate sheet if necessary)

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). Consider any contextual information that may be appropriate to know.

Managing Allegations Flow Chart

LADO SERVICE CONTACT AND PATHWAY



Please note:

- The initial phone contact with the LADO service goes directly to the LADO business support officer whose responsibility it is to pass the callers details to the DUTY LADO who will then call back where required.
- The business support officer **will not advise on threshold or safeguarding matters**. Where the caller states that the reason for their contact is to discuss/ make a LADO referral, the business support officer will advise them to complete a referral form which will then be passed to the DUTY LADO to triage/assess.
- **Completing a referral form does not determine threshold for LADO involvement**. However, completing a referral form will provide the DUTY LADO with the relevant safeguarding concern/allegation detail which they need to read, review and respond to via the referral form. Responding on the referral form is beneficial for the referrers record keeping and allows the LADO to be accountable for advice given.
- Following the triage process, the DUTY LADO will inform the referrer of the outcome of the LADO contact which could be NFA, advise/support and or threshold met. Where threshold is met, the case will be passed to the LADO manager for allocation consideration after which a named LADO will be allocated manage/monitor the case.

You can contact the LADO service via phone/email:
Phone: 0300 123 1650 (option 3)
Email: LADO@surreycc.gov.uk

03/02/2022

Reviewed: June 2021, May 2022, June 2022, July 2022, September 2022, July 2023, June 2024, July 2025

Next review date: June 2026

Person Responsible: Mr Mark Parton (DSL)