



# HERNE VIEW CHURCH OF ENGLAND PRIMARY SCHOOL

*including Apple Orchard Pre-School*

## Low Level Concerns

Review Date	Version No	Date of last Review
Autumn 1 FGB 2023	1	New Policy

Date approved by the Board	Chair	Signature
12 October 2023	Guy Adams	

### *Our Vision*

Building for tomorrow, we share knowledge and foster aspirations through acceptance and welcome. We strive to strengthen our connection to the whole community through dignity and respect. Children are the heart of Herne View Primary and we celebrate the worth and uniqueness of all.

'...let your light shine.' Matthew 5:16

*Care*

*Friendship*

*Respect*



# Herne View Church of England Primary School

## Low Level Concerns form

### Introduction

At Herne View Church of England 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 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 Head Teacher about their concern using a Low-Level Record of Concern Form. If they cannot be contacted, the Chair of Governors should be contacted instead. If the concern is about the Headteacher this must be reported to the Chair of Governors.

### Keeping Children Safe in Education September 2023

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

#### *Section Two: Concerns or allegations that do not meet the harm threshold*

423. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

#### Low-level concerns

424. As part of their whole school or college 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 101 supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

425. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning 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. 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, 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.

428. 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.

429. 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.

## Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

<b>ALLEGATION</b>	<p>Behaviour which indicates that an adult who works with children 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 they may pose a risk of harm to children; and/or</li> <li>• behaved or may have behaved in a way that indicates they may not be suitable to work with children</li> </ul>
<b>LOW-LEVEL CONCERN</b>	<p>Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above.</p> <p>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 may have acted in a way that:</p> <ul style="list-style-type: none"> <li>• is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and</li> <li>• does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, on a no-names basis if necessary</li> </ul>
<b>APPROPRIATE CONDUCT</b>	<p>Behaviour which is entirely consistent with the School's staff code of conduct, and the law.</p>

### Staff Low-Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with Herne View Church of England Primary School's Code of Conduct policy including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO.

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).

The record should be signed, timed and dated – see form at end of policy

### 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. 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 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 Herne View Church of England 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.

**Herne View Church of England Primary School – Low Level Concerns form**

<b>Name of staff member</b>	<b>Role in school</b>
<b>Concern being raised:</b>	
<b>Name of individual raising the concern:</b>	<b>Time and date:</b>
<b>Signed:</b>	<b>At (time and date):</b>
<b>Received by:</b>	<b>Action Taken: (Specify) Name of person investigating the concern:</b>

<b>Signed:</b>	<b>Time and date:</b>