BRACKNELL FOREST COUNCIL

LOW-LEVEL CONCERNS POLICY

FOR SCHOOLS

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Purpose of the policy

At [name] school, we aim to create an open and transparent culture where all concerns about all 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 also aims to protect staff working in our school from potential false allegations or misunderstandings. This policy should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies.

This policy follows guidance contained in the Keeping Children Safe in Education document and associated advice.

Keeping children safe in education - GOV.UK (www.gov.uk)
This policy sets out how to identify and record a low-level concern and thus, is not in itself a formal process or investigation.

Who does it apply to?

This policy applies to all staff, meaning anyone working in or on behalf of the school, such as a paid employee, including supply teachers, worker or contractor, or unpaid member of staff or volunteer, and governors.

What is a low-level concern?

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the threshold of harm or is not considered serious enough for the school to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone

Allegation vs low-level concern vs appropriate conduct – traffic light system

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.**

How to share a low-level concern

A member of staff who has a concern about a colleague, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk, should inform the Headteacher (HT) or Designated Safeguarding Lead (DSL) as soon as possible ideally within 24 hours of becoming aware of it. The concern can be shared verbally with the HT/DSL or by completing the form at Appendix B. If reported verbally, the HT/DSL should record the information using the Low-Level Record of Concern Form- Appendix B.

Should a member of staff wish to report a concern, and not be named, this request should be respected as far as possible.

How to handle a low-level concern

Upon receipt of a concern, the Headteacher or DSL must as soon as is reasonably practicable:

1. Review the concern/s. This may include asking the reporter of the concern to provide any further information/ clarification.

2. Discuss the concern with the person against whom the concern is raised. Providing them the right to reply to the concern and informing them of any action that may subsequently be taken.

3. Follow the relevant procedure which may include a referral to the LADO or steps taken to address unprofessional behaviour.

How to record and store a low-level concern (LLC)

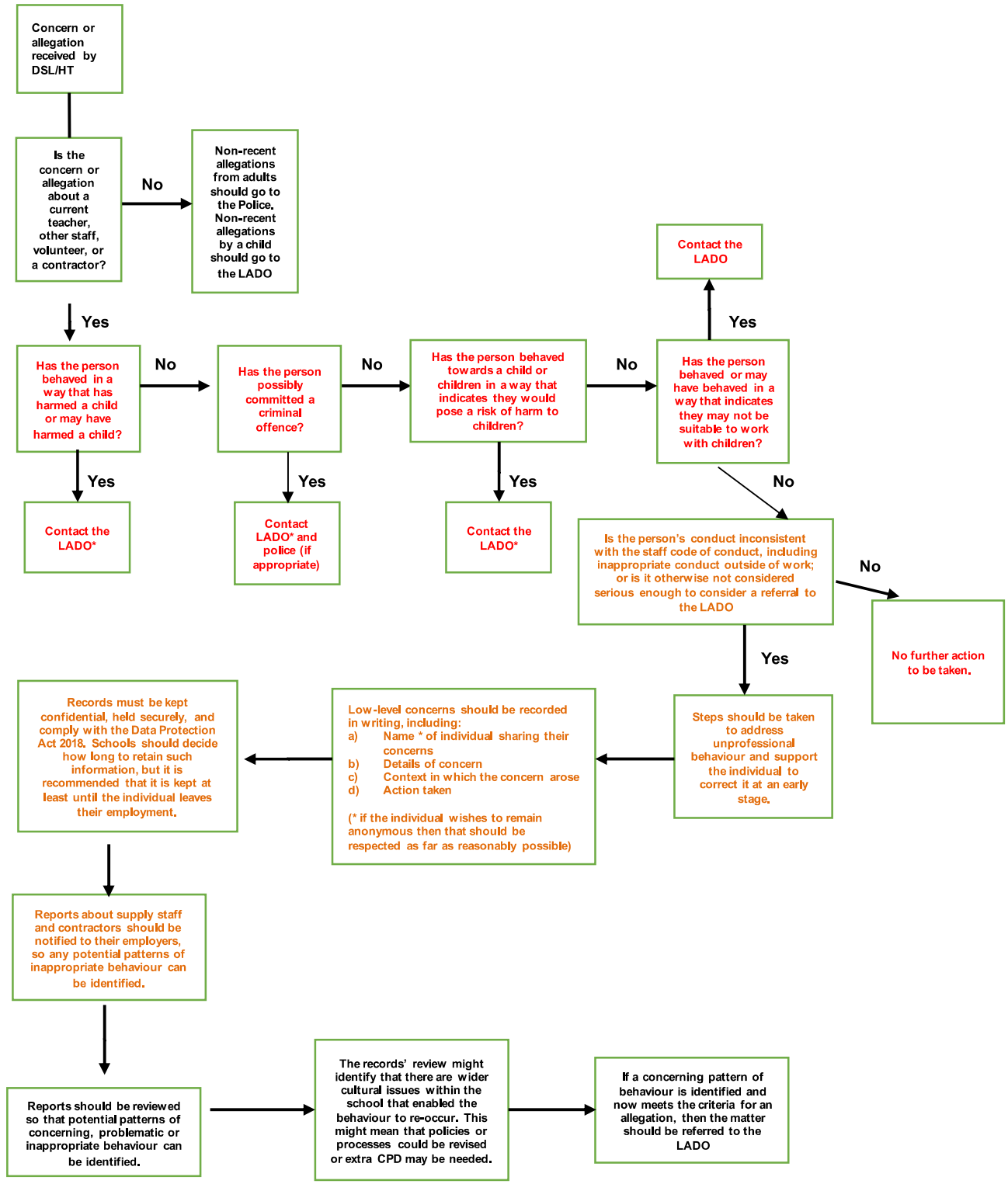
LLC forms and follow up information will be stored securely within the school's safeguarding systems with access only by the Headteacher/DSL. The deputy DSL may access low-level concerns records where instructed by the HT/DSL. Low-level concern records must be kept centrally along with other safeguarding and child protection records, and within the staff personnel file. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) who reported the concern must keep the information confidential and not share the concern with any other person apart from the Headteacher or the DSL.

When a member of staff leaves employment, any low-level concerns record will be reviewed as to whether that information needs to be kept. Consideration will be given to whether the content has still got any value, either as a safeguarding measure or because of possible relevance to future claims.

Low-level concerns will not be referred to in a reference unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Appendix A Flowchart – Dealing with a Low-level Concern



- **LADO can be contacted on 01344 351572; lado@bracknell-forest.gov.uk**

NB – if the concern is about the Headteacher, then the Chair of Governors should be informed.

Appendix B Form – Low-level concern Reporting Form

Your Details	
Name	
Role	
Date and time of completing this form	
Details of individual (including yourself for self-reporting) whom this concern is about.	
Name	
Role	
Relationship to the individual reporting e.g. manager, colleague	
Details of concern	
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 the staff code of conduct?	
Details of any children or young people involved (please include full name (s), age and gender):	
Name(s)	
Signature:	

For use by HT/DSL upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow up	