



TWO RIVERS  
HIGH SCHOOL



# Low Level Concerns Policy and Guidance

## TWO RIVERS SCHOOL

<b>Last Review Date:</b>		Autumn Term 2023
<b>Next Review Date:</b>		Autumn Term 2024
<b>Committee:</b>		Full Governing Board
<b>Review Cycle:</b>		1 YEAR
<b>Statutory Policy:</b>		Yes
<b>Date</b>	<b>Version</b>	<b>Reason for change</b>
Autumn Term 2022	V1.0	New Policy Drafting
Spring Term 2023	V2.0	Additional Information
Autumn Term 2023	V3.0	Scheduled Review

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### 1. Introduction

At Two Rivers 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 should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies.

### 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 Executive Headteacher/Headteacher about their concern using a Low-Level Record of Concern Form. If the Executive Headteacher/Headteacher cannot be contacted, the Chair of Local Governors should be contacted instead.

### 3. Keeping Children Safe in Education September 2023

The following is taken from [Keeping Children Safe in Education 2023](#) and identifies what may be considered behaviour relating to low level concern:

#### ***What is a Low-Level Concern (LLC)?***

427. 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.

428. 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.

429. 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.

430. 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**

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Leadership Team. 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 Executive Headteacher/Headteacher 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 Two Rivers 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. Learning lessons

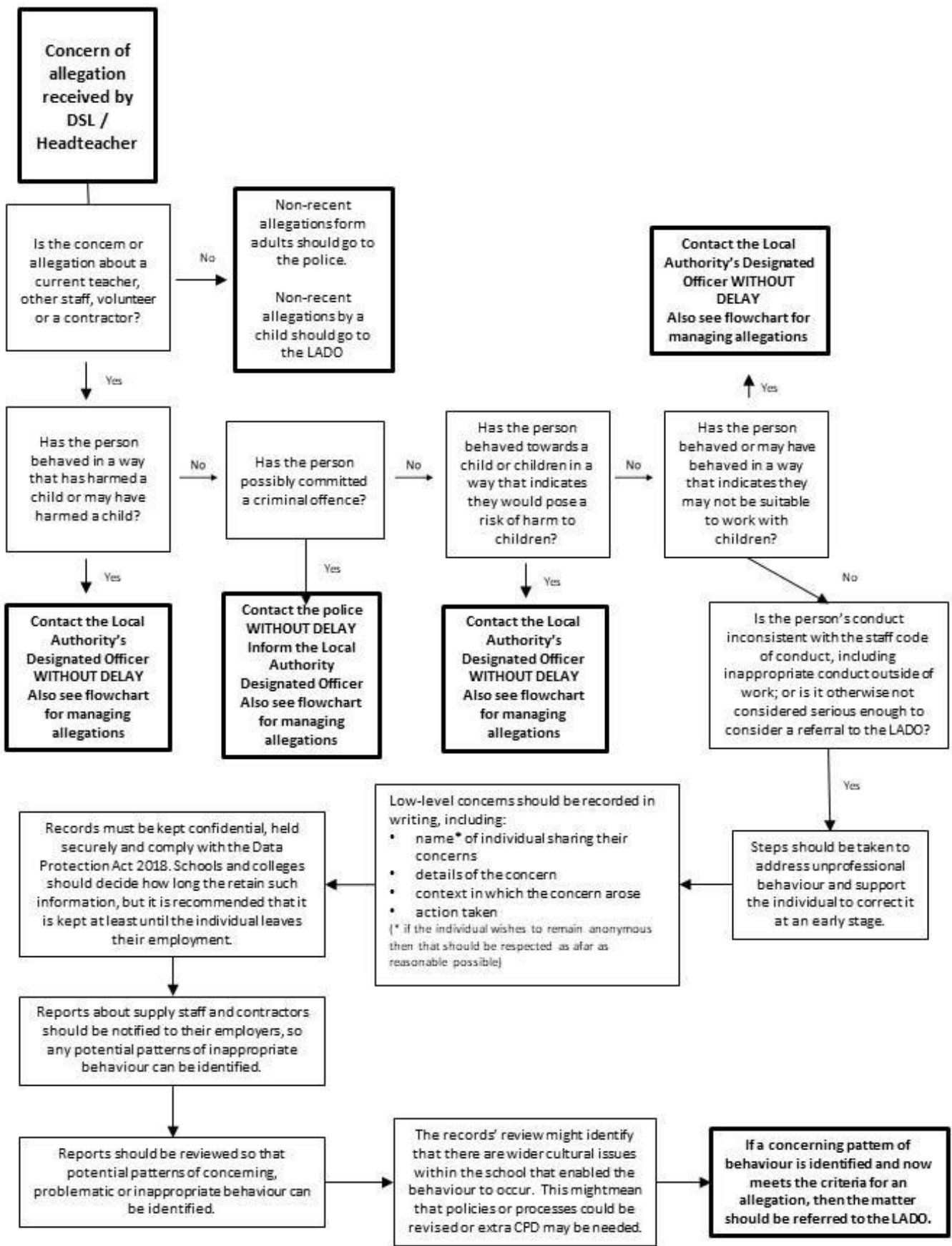
It is important that lessons are learnt when managing all levels and types of allegations.

The Executive Headteacher/Headteacher will review the circumstances of all substantiated cases with Staffordshire's LADO to determine whether improvements can be made to the school's procedures to help prevent similar events in the future. This will be done throughout the entirety of the process and at conclusion.

Lessons will also be learnt from the use of suspension should the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

Where an allegation is concluded to be either unfounded, false, malicious or unsubstantiated the Executive Headteacher/Headteacher (and if they have been involved the LADO) will consider the facts of each case and determine whether any lessons can be learned, and improvements made.

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



**\*NB – if the concern is about the Executive Headteacher/Headteacher, then the Chair of Local Governors should be informed.**

## 8. Low level Concerns Reporting Form

Your details		
Name (optional)		
Role		
School		
Date and time of completing this form		
Details of individual (including yourself for self-reporting) whom the concern is about		
Name		
Role		
Relationship to the individual reporting eg manager, colleague		
Details of concern		
<p><b>Please include as much detail as possible. Think about the following:</b> 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>		
Details of any children or young people involved		
Name(s)		
Next Steps		
Are you willing to meet with the Executive Headteacher/Headteacher and DSL to discuss your concern? Please circle as appropriate.	YES	NO



<p>Please state any other information that you feel is relevant to the processing of this concern.</p>	
<p>Signature</p>	

<p>For use by EHT/HT/Safeguarding Team upon receipt of the concern</p>	
<p>Date and time concern received</p>	
<p>Signature</p>	
<p>Role</p>	
<p>Actions to be taken and follow-up.</p>	