Cambian Devon School Safeguarding Policy –
(5) Managing Low Level Concerns Policy

Claire Benjafield

DSL

Abbi Salisbury

Deputy DSL

Scott Salisbury

Deputy DSL

Daniel Wilson

Deputy DSL

Introduction

This policy is written in line with Keeping Children Safe in Education (KCSiE) 2024 and Working Together to Safeguard Children 2023.

We also provide education to individuals over the age of 18 years. With that in mind, this policy has also been written in line with the Care Act 2014, Education Act 2002 and the Mental Capacity Act 2005. Those over the age of 18 are referred to as Students.

Wider Policies support this Child Protection Policy. All are numbered and sit alongside to create the school safeguarding policy.

1. Child Protection Policy
2. The Role of the DSL Policy
3. Child on Child Abuse Policy
4. Filtering and Monitoring Policy
5. Managing Low Level Concerns Policy

6. Absent from Education Policy
7. Schools Safer Recruitment Policy
8. Managing Contextual Risks to Children
9. Adult Safeguarding Policy

Aims of this policy

This policy is written to support staff and the DSL and/or the Headteacher to better understand:

- What are Low Level concerns
- How to manage concerns or allegations that do not meet the harm threshold
- How to share Low Level concerns
- The procedure for sharing Low Level concerns
- How to record Low Level concerns

What is a Low-Level Concern?

The Department of Education DfE describe this in KCSiE 2024 as:

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 / 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/students
- having favourites
- taking photographs of children/students on their mobile phone, contrary to school/college policy
- engaging with a child/student on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children/students
- behaving in a manner inside or outside of work which brings into question their suitability to work with vulnerable individuals

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.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child/student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

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.

Managing concerns or allegations that do not meet the harm threshold

As part of our whole school approach to safeguarding, our schools promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. In doing this we aim to:

- identify inappropriate, problematic or concerning behaviour early
- reduce the risk of abuse, and
- ensure that adults working in or on behalf of the school/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school/college.

All concerns are reported to the DSL immediately. The DSL gathers basic information to decide on how to escalate. This information includes; the names of the child/children/students involved, their age, a description of the allegation and any factors which could place the individuals at further risk.

The DSL then has a discussion with the Headteacher to decide whether this can be managed as a low-level concern or will require a referral to an external agency such as LADO.

Sharing low-level concerns

Our school ensures the low-level concerns policy contains a procedure for sharing concerns which is clear, easy to understand and implement.

The DSL informs the Headteacher of all the low-level concerns without delay. The Headteacher is the ultimate decision maker in respect of all low-level concerns. However, the Headteacher may wish to consult with the DSL and take a more collaborative decision-making approach.
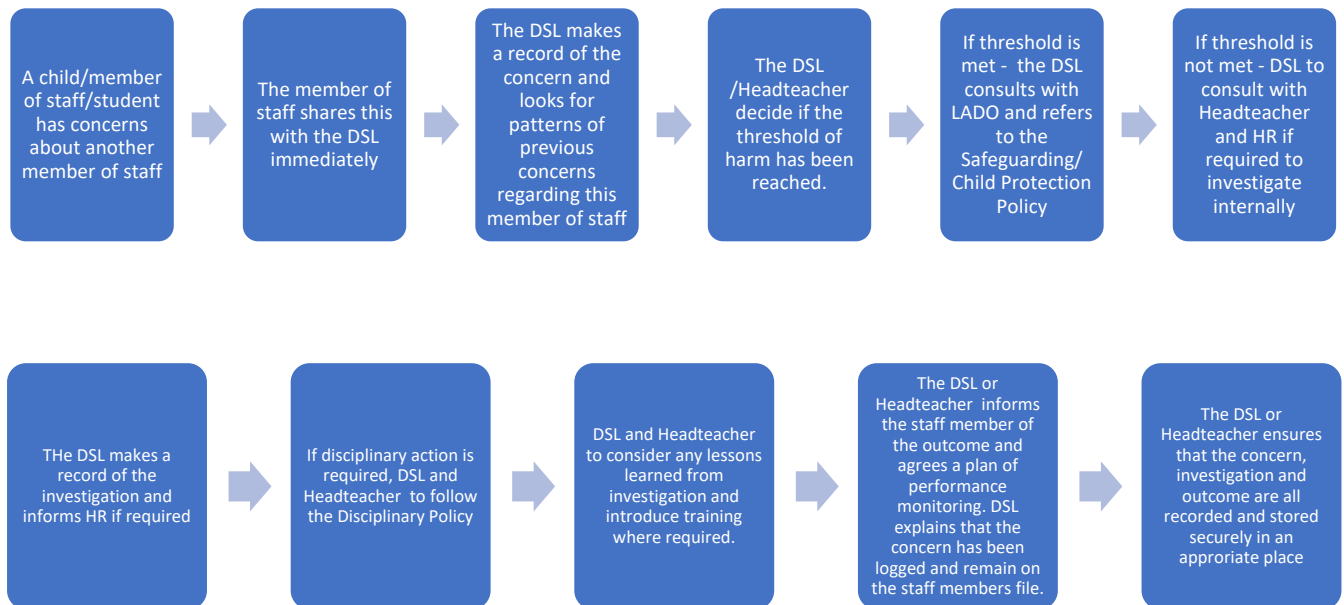
Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If schools are in any doubt as to whether the information which has been shared about a member of staff is a low-level concern or in fact meets the harm threshold, they should consult with their LADO.

Our school has created an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be

misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

The Procedure for sharing Low Level Concerns

| A child/member of staff/student has concerns about another member of staff | The member of staff shares this with the DSL immediately | The DSL makes a record of the concern and looks for patterns of previous concerns regarding this member of staff | The DSL /Headteacher decide if the threshold of harm has been reached. | If threshold is met - the DSL consults with LADO and refers to the Safeguarding/ Child Protection Policy | If threshold is not met - DSL to consult with Headteacher and HR if required to investigate internally |

| THe DSL makes a record of the investigation and informs HR if required | If disciplinary action is required, DSL and Headteacher to follow the Disciplinary Policy | DSL and Headteacher to consider any lessons learned from investigation and introduce training where required. | The DSL or Headteacher informs the staff member of the outcome and agrees a plan of performance monitoring. DSL explains that the concern has been logged and remain on the staff members file. | The DSL or Headteacher ensures that the concern, investigation and outcome are all recorded and stored securely in an appropriate place |

When appointed, the DSL contacts their local safeguarding partner to agree the threshold for concerns. The DSL reviews this annually as a minimum to ensure they are confident of the threshold for allegations.

Recording low-level concerns

All low-level concerns are recorded in writing on Behaviour Watch. The record includes details of the concern, the context in which the concern arose and action taken. The name of the individual sharing their concerns are also noted. If the individual wishes to remain anonymous then that is respected as far as reasonably possible.

Records are reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school decides on a course of action, either through its disciplinary procedures (HR) Disciplinary Policy – onrezume.com or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO Report child abuse to a local council - GOV.UK (www.gov.uk) or Adult Local Authority Safeguarding Team (for concerns related to over 18s) with the Safeguarding/Child Protection Policy guiding this process.

Consideration is also given to whether there are wider cultural issues within the school that enabled the behaviour to occur. In this case, the Headteacher contacts the Head of Policy and Head of Quality and Improvement to update and where appropriate policies are revised and/or extra training is delivered to minimise the risk of it happening again.

Our school retains concerns at least until the individual leaves their employment.

Review

A review will be undertaken annually as a minimum.

However, subject to a significant safeguarding concern this policy and all other attached policies will be reviewed and monitored as part of a lessons learned review.

Reviewed – January 2025 by Laura Dickie, Head of Policy Children's Services. Also reviewed by Pottersbury Lodge School and Lufton College.

Next Review – September 2025

Written by:

This policy was written by Matt Nicholls – Head of Policy Children's Services and has been reviewed by Christina Leath – Group Safeguarding Director. This policy has been reviewed by the DSL of the School and agreed by the head of the Governance Board.