



LOW-LEVEL CONCERNS POLICY

SANDON PRIMARY ACADEMY

Mrs R Beckett & Mrs L Kiddle (Co-Principals)

Review date: September 2027

Introduction

At Sandon Primary Academy, 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. If the Head Teacher cannot be contacted, the Chair of Trustees should be contacted instead.

Keeping Children Safe in Education September 2022

The following is taken from Keeping Children Safe in Education September 2022 Part 4, section 2

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 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?

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 (PLEASE REQUEST A COPY OF THE STAFF CODE OF CONDUCT OR FIND THIS IN INDUCTION PAPERWORK SHARED WITH STAFF)
- 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.

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, 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.

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.

Staff Training

All staff at Sandon Primary Academy receive training on recognising and reporting low-level concerns as part of their safeguarding induction. This includes guidance on professional boundaries, examples of concerning behaviours, and the process for reporting concerns confidentially. Refresher training is provided every three years and the whistle blowing procedures are regularly shared in briefing and displayed as a flowchart around the school. This training reinforces the school’s commitment to maintaining a transparent and safe environment for all pupils.

Anonymous Reporting

While staff are encouraged to report low-level concerns openly and directly to the Head Teacher, Sandon Primary Academy recognises that there may be occasions where individuals feel more comfortable reporting anonymously. Anonymous concerns can be submitted through a written note, and will be treated seriously and investigated appropriately. The school will make every effort to maintain confidentiality and ensure that anonymous reports are handled sensitively, while also balancing the need for sufficient information to take appropriate action.

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

Low level concerns 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 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 Sandon Primary Academy, 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:

- 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

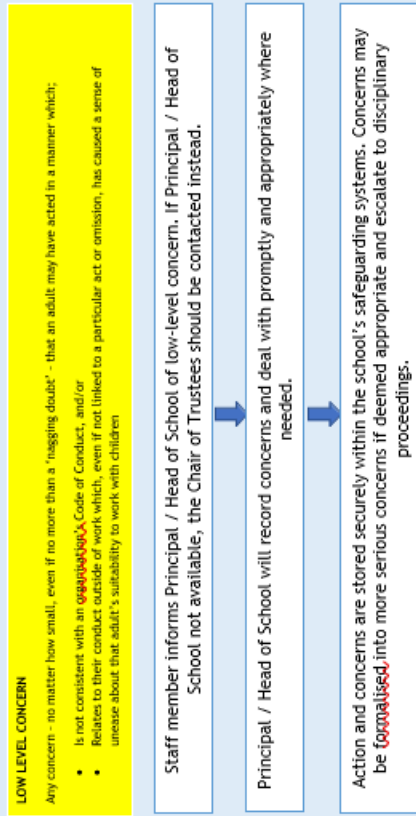
- if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly

Monitoring and Oversight

Low-level concerns are monitored over time to identify any emerging patterns of behaviour that may indicate a need for further action. The Designated Safeguarding Lead (DSL) is responsible for maintaining oversight of all recorded concerns and ensuring they are reviewed regularly. This ongoing monitoring helps to ensure that concerns are not viewed in isolation and that staff conduct remains consistent with the school's safeguarding expectations.

Sandon Primary Academy: Creating a Vigilant & Transparent Culture to Safeguard Children

Low Level Concerns Flow Chart



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 that relates to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

Whistleblowing Procedure

The Academy hopes that in many cases Staff will be able to raise any concerns with their Line Manager, speaking to them in person or putting the matter in writing if they prefer. They may be able to agree a way of resolving a concern quickly and effectively. However, where the matter is more serious, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should:

Raise serious concerns with the school Principal or Chair of Trustees

Meeting arranged with 'whistle-blower'. The name of the employee and nature of the concern will be recorded. The Principal will also find out if 'whistle-blower' would like to remain anonymous. In some cases, this may not be possible to enable the concern to be dealt with effectively.

Once a member of staff has raised a concern, the Academy will carry out an initial assessment to determine the scope of any investigation. The Academy will inform the 'whistle-blower' of the outcome of its assessment. The member of staff raising the concern may be required to attend additional meetings in order to provide further information.

In most cases a panel of three Trustees/Governors will investigate any issue. In rare cases the Academy may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Academy to **reduce** the risk of future wrongdoing.

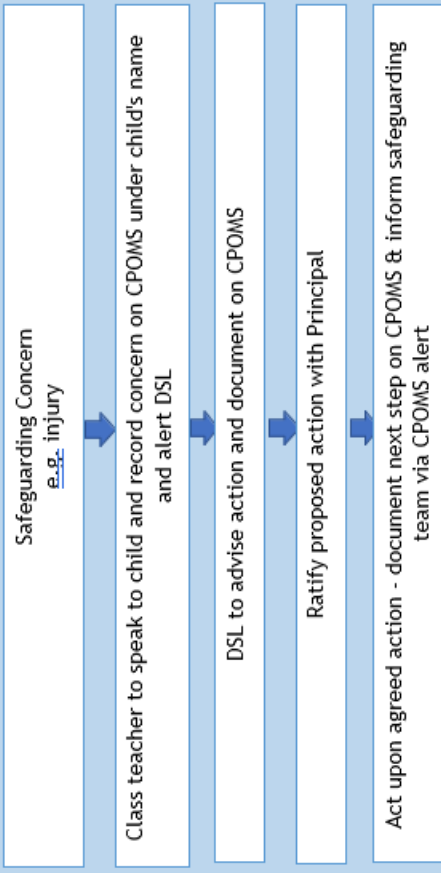
The Academy will aim to keep the member of staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the School from giving specific details of the investigation or any disciplinary action taken as a result. The member of staff is required to treat any information about the investigation as strictly confidential.

Whilst the Academy cannot always guarantee the outcome a particular member of staff is seeking, the Academy will try to deal with the concern fairly and in an appropriate way. If a member of staff is not happy with the way in which his or her concern has been handled, he or she can raise it with one of the other key contacts outlined above.



If an allegation is made...

Safeguarding Process



If an allegation is made, or information is received about an adult who works or volunteers in our school which raises concerns, the member of staff receiving the information should inform the **Principal** immediately. Should an allegation be made against the **Principal**, this will be reported to the Chair of Trustees.

In the event that neither the **Principal** nor Chair of Trustees is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Principal or the Vice Chair of Trustees.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Principal or Chair of Trustees can contact the Local Authority Designated Officer directly 01782 235100 or email CHAD.B@ernals@kpsale.gov.uk

When a concern is raised about an adult in our school, the **Principal** (or other appropriate person, as above) will seek advice from the Local Authority Designated Officer (LADO) at the earliest opportunity. No one will undertake further investigations until they receive advice from the LADO.

The Local Authority Designated Officer will convene a strategy meeting when there are concerns that a person in a position of trust **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; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

If the LADO deems that the referral does not meet the criteria for his involvement, we may still undertake our own investigation into the alleged events and if necessary, involve disciplinary procedures.

Key Safeguarding Staff

Designated Safeguarding Lead: Mrs Kate Burrows	Deputy Designated Safeguarding Lead: Miss Melanie Lear	Mental Health Lead: Mrs Kate Burrows	Learning Mentor: Mrs Mandy Morgan	Trustee with Responsibility for Safeguarding: Mrs Gemma Beckett	Chair of Trustees: Mr Ian Bagnall	SENCo: Lyndsay Colclough
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