

## Low Level Concern Policy

### Introduction

At Grantham Farm Montessori School we are committed to safeguarding children and promoting their welfare at all times.

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour as set out in the staff behaviour and code of conduct are lived, monitored and reinforced constantly by all staff.

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 are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution

This policy applies to all concerns (including allegations) about members of staff, including students, volunteers and agency staff. We ensure that all those working with children behave appropriately and the early identification and prompt and appropriate management of concerns about adults is critical to effective safeguarding. This section is based on concerns that do not meet the harm threshold, as defined in Keeping Children Safe in Education part four.

As set out in Part two of this guidance, the senior leadership team and proprietor will ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

The senior leadership team and proprietor will ensure there are procedures in place, as described in paragraph 71 and 73 of Keeping Children Safe in Education 2023, to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members (including supply staff, volunteers, and contractors) where they have acted in a way that is not consistent with the staff code of conduct whether in or outside of work.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks.

## **Definition of 'low-level' concerns**

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 considered serious enough to consider a referral to the local authority designated officer (LADO).

The behaviour of the staff, student or volunteer may not relate directly to a particular child or children but may raise an issue or issues of concern with respect to safeguarding a child/children. This may potentially call into question the adult's suitability to work with children.

Examples of such behaviour could include, but are not limited to:

- Being overly 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
- Humiliating children
- Using inappropriate sexualised, intimidating or offensive language

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.

## **Sharing low-level concerns**

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 from becoming the subject of potential false low-level concerns or misunderstandings.

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We create this culture by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or colleges safeguarding system

A low-level concern about a member of staff should be reported to the Designated Safeguarding Lead (DSL) and the head teacher following the school's Safeguarding Children and Child Protection Procedures. Staff should use the school Low-Level Concerns Reporting Form (below).

### **Responding to low-level concerns procedure**

- Low-level concerns must be shared initially with the headteacher or DSL. If the latter, then the DSL will inform the headteacher of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The head teacher will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the head teacher 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 should 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 as a low-level concern in fact meets the harm threshold, they should consult with their LADO.
- If the concern is raised via a third party, the DSL/head teacher will collect as much evidence as possible by speaking:
  - directly to the staff who raised the concern, unless it has been raised anonymously, and
  - to the individual involved and any witnesses
- The information collected will help the head teacher to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken
- If the staff member who raises the concern does not wish to be named, then the school should respect that person's wishes as far as possible: however, there may be circumstances where the staff member who raises the concern will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity should never be promised to members of staff who share low-level concerns. Where possible, we will encourage staff to consent to be named, as this will help to create a culture of openness and transparency
- The DSL/head teacher will speak to any potential witnesses, unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted
- The DSL/head teacher will speak to the staff member about whom the low-level concern has been raised, unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted
- The DSL/head teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with our staff Code of conduct
- Allegations that meet the harm threshold will be referred to the LADO for advice
- Where there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, or where further guidance is needed, the DSL/head teacher will consult with their LADO for advice
- Low-level concerns that the school feel can be dealt with internally will be dealt with via the school Safeguarding children and child protection procedures and/or Disciplinary Procedures
- Where a low-level concern relates to agency staff, we will notify the agency, so any potential patterns of inappropriate behaviour can be identified

- Staff are encouraged and have the confidence to self-refer, where, for example, s/he has found his/herself in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection s/he believe s/he has behaved in such a way that s/he considers falls below the expected professional standards.

### Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern, records will include the context in which the concern arose, action taken and the reasons for decisions and action taken. If the individual wishes to remain anonymous then that will be respected as far as reasonably possible; however, anonymity cannot never be promised.

Records will be:

- Reviewed so that potential patterns of concerning, difficult or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it will be referred to the LADO
- Retained at least until the volunteer, student or staff leaves employment at the school
- Kept confidentially, held securely and comply with Data Protection Act 2018 (DPA 2018) and UK GDPR procedure.

### Reviewing low-level concerns

When reviewing records of low-level concerns, patterns of concerning, challenging or inappropriate behaviour may be identified. When this occurs, the DSL/manager will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

### Pre-employment references

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority(LADO) and is found to be substantiated

and/or

- The concern (or group of concerns) relates to issues which would be included in a reference, such as misconduct or poor performance

<b>This policy was adopted on</b>	<b>Signed on behalf of the school</b>	<b>Date for review</b>
<i>September 2024</i>	<i>E. Wetherley</i>	<i>September 2025</i>

**Low-Level Concern Form**

**Name**

**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 Grantham Farm Montessori School’s staff code of conduct, 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 and returned to the Headteacher

Name of staff member:

Role at the School:

Details of Concern:

**Date:**

**Signed:**

**Name:**