

<b>Low Level Concerns Procedures</b>			
<b>Date</b>	<b>Review Date</b>	<b>Lead Person</b>	<b>Nominated Governor</b>
<b>Autumn Term 2023</b>	<b>Autumn Term 2024</b>	<b>Headteacher</b>	<b>Chair of Governors</b>

**Low Level Concerns [Keeping Children Safe in Education 2023]**

**(see also addendum to the School Code of Conduct for Staff and Volunteers)**

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.

Behaviour which may be considered as a low-level concern can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, which however, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

**Cononley Primary School Procedures:**

Cononley Primary School follows the advice from NYES HR, and from the LADO team within North Yorkshire:

- any concern about an individual working with children or on school site should be considered in discussion with LADO and NYES HR to ensure that the advice provided considers the full range of circumstances. Therefore, even when concerns about an adult do not, at first consideration, appear to meet the harm threshold, you are advised to seek advice from the LADO and NYES HR.
- It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. It is expected that initially, concerns will be raised with the Designated Safeguarding Lead /Headteacher.

Headteachers are advised to discuss any concerns with the LADO and NYES HR.

- Following initial discussion with the LADO and / or NYES HR, on receipt of a low-level concern from a third party, the Designated Safeguarding Lead / Headteacher will collect as much evidence as possible by speaking to the person who raised the concern and to the individual involved and any witnesses. This information will aid your consideration of any further action that may be necessary.
- Where it has been confirmed that the concerns do not meet the threshold to be considered as an allegation under the local safeguarding children board procedures, schools are advised to consider whether the matter relates to poor performance or alleged misconduct, and therefore should consider their disciplinary and developing performance / capability policies in determining the most appropriate way of addressing their concerns. Each case will be considered on its merits, and action may range from monitoring and additional supervision, informal management advice through to a more formal disciplinary investigation and the possibility of a formal disciplinary sanction where the concerns are of a more serious nature, or demonstrate a pattern where informal action or support has not been successful in resolving the identified concerns.
- All actions taken by the school in respect of the low-level concerns, all instances should be recorded clearly and comprehensively in writing, including the details of the concern, the context in which the concern arose, and the action taken. The form provided by NYSCP for low-level concerns will be used for recording incidents. The name of the individual sharing their concern should also be noted; if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible. Records will be kept confidential on the secure Safeguarding Folder on Sharepoint (which can only be accessed by the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead) and comply with GDPR. It is recommended that records are held in one place and not as part of an individual's own personal file. School will retain the records at least six years after the individual leaves their employment, in line with other HR file retention protocols. .
- Records will be reviewed each term so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on an appropriate course of action, and it is advised that advice is sought from NYES HR and the LADO. Any concerns which have the potential to meet the harm threshold must be referred to the LADO in line with the local safeguarding children board procedures.

### **Low Level Concerns about the Headteacher**

- Low level concerns about the Headteacher should be reported to the Chair of Governors (Katie Mason): [katiemason@cononley.n-yorks.sch.uk](mailto:katiemason@cononley.n-yorks.sch.uk) . The Chair of Governors will contact the LADO for advice.

### **Low Level Concerns about Supply Staff and Contractors**

- Any concerns about supply staff and contractors working in school should be reported to the DSL/ Headteacher – Catherine Pickles. The low level concern form (see below) will be used to record any concerns and the DSL will notify their employers, so that any potential patterns of inappropriate behaviour can be identified.

## Low Level Concern Form

This form can be used to share any concern with the Designated Senior Manager/Headteacher, no matter how small or seemingly insignificant, 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 the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

### Details of CONCERN :

**Name of Staff member :**

**Department and Role :**

**Signed :**

**Time and Date :**

**Received by :**

**At [time] :**

**Date :**

**WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].**

**NO  - Give a brief but valid reason/explanation for not;**

**YES  - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :**

**ACTION TAKEN :**

Was advice/guidance sought from the LADO and or Human Resources? Yes :  No :

**Signed :**

**Dated :**

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons.