



## Cayton School Low Level Concerns policy

### **Introduction**

At Cayton School, 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 Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Chair of Governors should be contacted instead.

Staff can make a 'self-referral'. This maybe when a situation has occurred that could be seen/deemed as favouritism (giving a family used clothes when in need) or accidentally hurt a child (something minor such as stepping on a child's finger). Staff are asked to complete the form and follow the same process (these are stored in the same file in a separate section).

### **Keeping Children Safe in Education September 2024**

#### **Low-level concerns**

*431. 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.*

*432. 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?**

*433. 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.*

*434. 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.

435. 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.

436. 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 may pose a risk or 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 the organisations 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.

### **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 Headteacher or those aware in the senior leadership team.

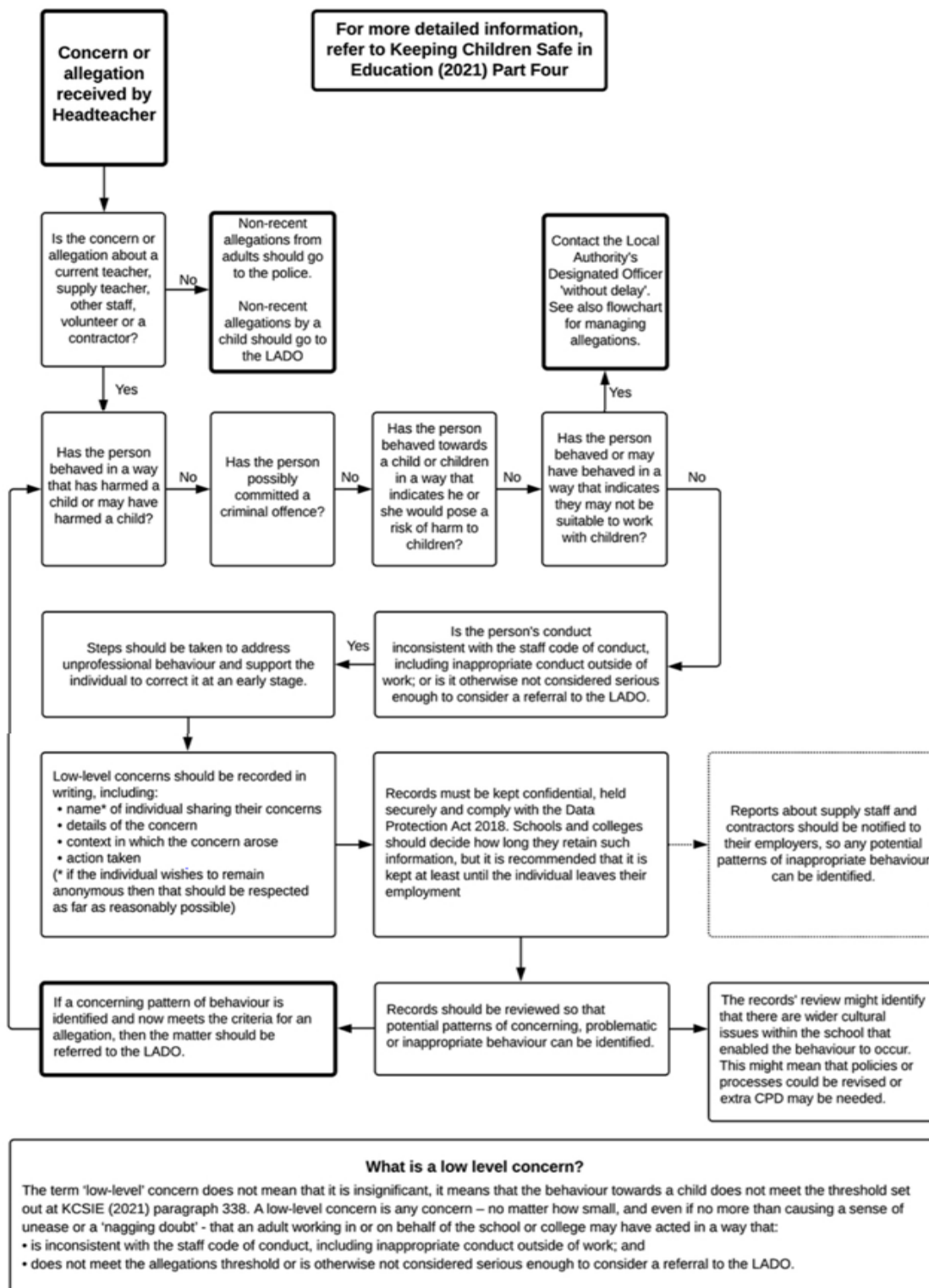
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Cayton 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.

**Process to follow when a Low-Level Concern is raised**



**Key Reference Document**

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2021.  
<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

## **Low Level Concern Form**

This form will be available to staff via:

- [www.caytonprimaryschool/safeguarding](http://www.caytonprimaryschool/safeguarding)
- The Office
- DSL
- The Senior Leadership Team

## **Low-Level Record of Concern Regarding a Staff Member**

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with Cayton School’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.

Where possible please speak with the Headteacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Headteacher. When completed, please pass this form to the Headteacher.

If the concern is about the Headteacher, please pass it onto the Chair of Governors or email them at [cog@cayton.n-yorks.sch.uk](mailto:cog@cayton.n-yorks.sch.uk)

Remember, a low-level concern is different to an allegation (which uses a different form). See the table below for a definition:

### **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 may pose a risk or 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 the organisations 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.

Policy Written: November 2021/ Updated January 2022/ Updated November 2022/ Updated September 2023

Revision Date: September 2024- updated

V4

**Low Level Concerns Reporting Form – Cayton School**

**Low Level Concern Form**

This form can be used to share any concern with the 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 :**

<b>Name of Staff member :</b>	<b>Department and Role :</b>
<b>Signed :</b>	<b>Time and Date :</b>

<b><u>To be completed by the Headteacher/SLT</u></b>	
Received by :	
At [time] :	Date :
<b>WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].</b> NO <input type="checkbox"/> - Give a brief but valid reason/explanation for not;	
YES <input type="checkbox"/> - Please complete detail below - <b>STAFF MEMBER'S RESPONSE TO CONCERN :</b>	
<b>ACTION TAKEN :</b>	
Was advice/guidance sought from the LADO and or Human Resources? Yes : <input type="checkbox"/> No : <input type="checkbox"/>	
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.