



NETWORK
INTERNATIONAL
SCHOOL

Low-Level Concern Policy

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Contents

Document Control Table	2
Contents	3
Introduction	4
Summary	4
Keeping Children Safe in Education September 2023	4
What is a low level concern?	4
Examples of such behaviour could include, but are not limited to:	5
Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct	6
Storing and use of Low-Level Concerns and follow-up information	7
Low Level Concern Form	8
Low-Level Record of Concern Regarding a Staff Member	8

Introduction

At Network International 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 details 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 Principal about their concern using a Low-Level Record of Concern Form. If the Principal cannot be contacted, the Founder should be contacted instead.

Keeping Children Safe in Education September 2023

The following is taken from Keeping Children Safe in Education September 2023:

- As part of their whole school 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.
- Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate 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 is any concern – no matter how small – that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider an external referral

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
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- 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.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and 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 potential false allegations or misunderstandings.

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

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 that they may pose a risk of harm to children.

Low level concern:

Any concern – no matter just 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.

Sharing low-level concerns

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.

Low-level concerns can be raised through the low-level concern form [here](#).

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns as per this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to Low-Level Concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

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

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

Kept confidential, held securely and comply with our data protection guidance

- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

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 and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Low Level Concern Form

This form will be available to staff via:

- **Google Drive**
- **School Intranet**
- **URL - [Link](#)**

Low-Level Record of Concern Regarding a Staff Member

Please use this form/and or email 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 the school’s Code, 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 Principal as soon as possible. It is also helpful to document your concerns, which can be done using this form (or email) and passed to the Principal. When completed, please pass this form to the Principal. If the concern is about the Head, please pass it onto the Founder.

Remember, a low-level concern is different to an allegation.

Low-Level Concern Form

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 Network International School 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. 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.

This form is automatically collecting emails from all respondents. [Change settings](#)

Name of Staff Member of Concern

*

Short-answer text

Detail of Concern

*

Long-answer text

Date of Concern

*

Data Protection

This record will be held securely in accordance with Network International School low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Network International School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.