



B01a: Low Level Concerns Policy

This policy is inclusive of all pupils in the school including those in the Early Years Foundation Stage to the Senior School (16+) stage of the school.

Policy Statement

St Hugh's School understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system.

This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

As part of its whole school approach to safeguarding, the school will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Definition of a Low-Level Concern

A low-level concern is any concern, not 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 school's Staff Code of Conduct and/or
- does not meet the allegation 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 when there is no professional reason to do so
 - 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.

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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, 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.

Reporting a Low-Level Concern

It is important that low-level concerns are shared with the DSL or Deputy Head Pastoral as soon as reasonably possible and, in any event, with 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern. The DSL or Deputy Head Pastoral will discuss the concern with the Head who will then decide on the next steps.

If the DSL or Deputy Head Pastoral is absent for any reason, low-level concerns should be shared with the Head.

Low-level concerns about the Head should be referred to the Chair of Governors.

How Should Low-Level Concerns be Shared?

The concern can be shared verbally with the DSL, or this [FORM](#) can be completed which will be accessed only by the DSL.

This record will be held securely in accordance with the School's Low-Level Concerns Policy. Please note that low-level concerns will be treated in confidence as far as possible, but the 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.

Responding to Low-Level Concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The DSL/Head will:

- Speak to the person who raised the concern
- If in any doubt, seek advice from the LADO – on a no names basis if necessary
- Speak to any potential witnesses (unless advised not to do so by the LADO).
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by LADO)
- Review the information to determine whether the behaviour:
 - Is consistent with the school's Staff Code of Conduct

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- Constitutes a low-level concern; no further action is required, or additional
- training/guidance/support may be required to rectify the behaviour via normal day to day management processes.
- Is serious enough to consult with or refer to the LADO

Can the Reporting Person Remain Anonymous?

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. Where there is a request to remain anonymous this will be respected as far as possible. However, there may be circumstance where this is not possible eg: where a disclosure is required by a court of local authority or under a fair disciplinary process.

Should Staff Self-Report?

It may be the case that a member of staff finds themselves in a situation that could be misinterpreted or might appear compromising to others, or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

How Should Low-Level Concerns be Held?

The school will retain all records of low-level concerns in a central low-level concerns file. Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, with a timeline alongside. These records will be kept confidentially and securely, with access only to the Head, Chair of Governors and HR.

Records will be reviewed periodically, and whenever a low-level concern is added, so patterns of concerning or inappropriate behaviour can be identified.

References

Low-level concerns will not be included in references unless it has met the threshold for referral to the LADO and found to be substantiated.

Governance

The Head will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

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