



# Lower-Level Concerns Policy

*Information for Parents: This policy is available on request.*

The Ursuline Preparatory School does not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

This policy is applicable to all persons appointed to work with our pupils including those in the EYFS.

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act (2018)
- DfE (2024) 'Keeping Children Safe in Education'

## **Introduction**

Ursuline Preparatory School is committed to safeguarding and promoting the welfare of children and young people and requires all staff and volunteers to share and demonstrate this commitment in every aspect of their work.

We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos. This policy should be read alongside our Safeguarding and Child Protection Policy, the Staff Code of Conduct and our Whistleblowing Policy.

## **1. 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 Deputy Headteacher should be contacted instead.

## **2. Keeping Children Safe in Education September 2024 (KCSIE)**

The following is taken from Keeping Children Safe in Education September 2024;

362. This part of the guidance is about managing cases of concerns/allegations that might indicate a person would pose a risk of harm<sup>128</sup> if they continue to work in their present position, or in any capacity with children in a school or college. In this part (section one) of the guidance reference is made to 'allegation' for ease. This part of the guidance should be followed where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

425. 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.

426. 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.

### **3. What is 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.

#### **4. 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 offense against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

##### **LOW-LEVEL CONCERN**

Any concern – no matter how small, that an adult may have behaved in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work;
- has caused a sense of unease about their suitability to work with children;
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

##### **APPROPRIATE CONDUCT**

Behaviour which is entirely consistent with our schools' Code of Conduct, and the law.

## **5. Storing and use of Low-Level Concerns and follow-up information**

Low-Level Concerns forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Headteacher. 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 the Deputy Headteacher.

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.

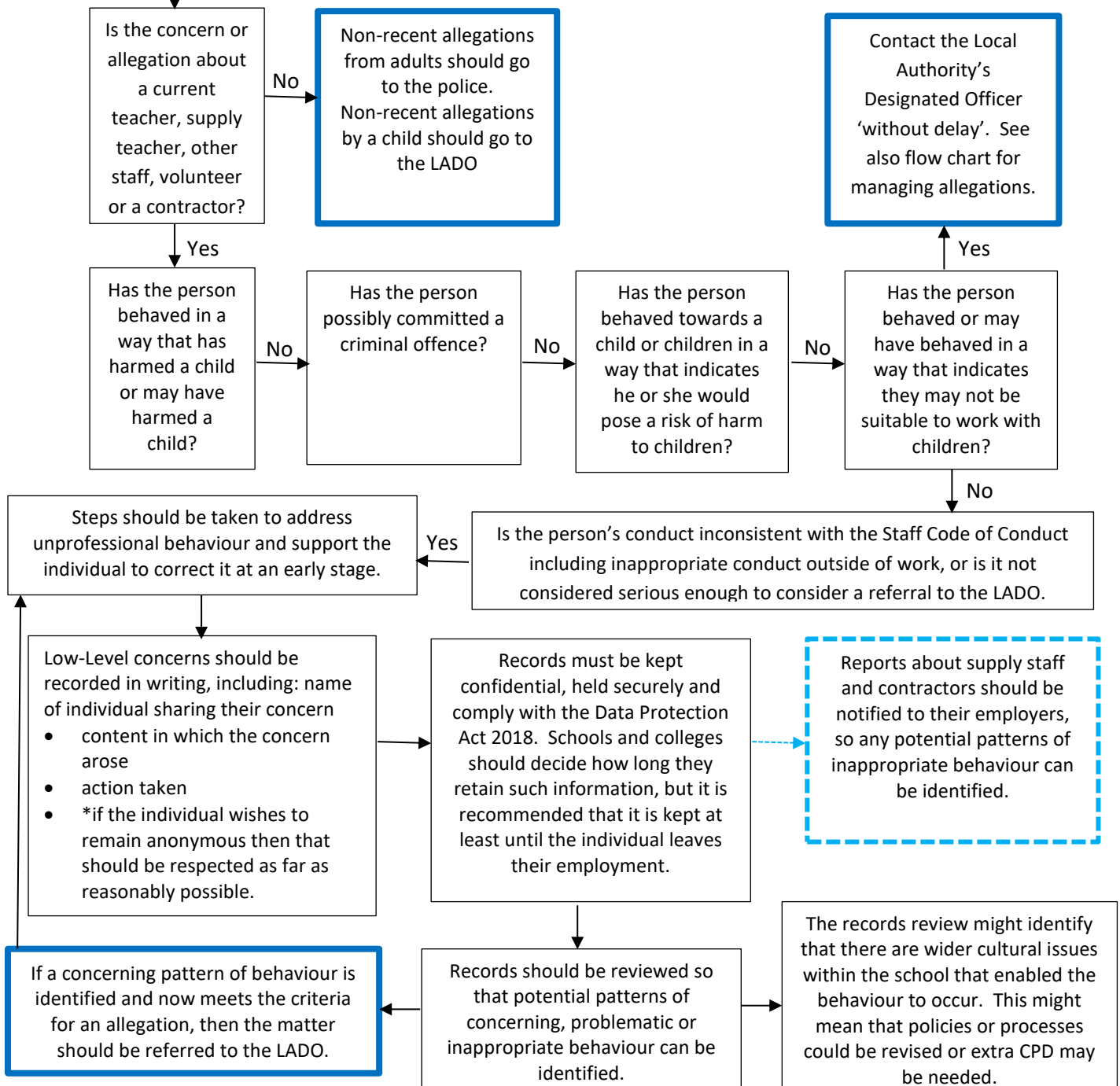
Whenever staff leave Ursuline Preparatory School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- 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
- if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

## 6. PROCESS TO FOLLOW WHEN A LOW-LEVEL CONCERN IS RAISED

Concern or allegation received by Headteacher\*  
\*if the concern is about the Headteacher, then the Chair of Governors should be informed

For more detailed information refer to:  
**Keeping Children Safe in Education (2024) Part Four**



### What is a 'Low-Level' concern?

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.

## 7. Low-Level Concern Form

Please use this form to share any concern that an adult may have acted in a manner which:

- is not consistent with Ursuline Preparatory School's Staff Code of Conduct
- relates to behaviour outside of work which, even if not linked to a particular act has caused a feeling about that person's suitability to work with children.

These forms are obtainable from the Headteacher.

Please fill in the below form, including as much detail as you can, and return it directly to the Headteacher.

Please refrain from discussing this concern with anyone other than the Headteacher until the matter has been dealt with.

**We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.**

## Low Level Concern Form

Your Details	
Name <i>(optional)</i>	
Role	
Date of completing this form	
Details of Individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern <i>e.g. colleague, line manager</i>	
Details of concern	
<p>Please include as much detail as possible. Think about the following: <i>What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</i></p>	



Details of any children or young people involved		
Name(s)		
Do you believe there is a risk of harm to the above named, either now or in the future, as a result of the person's behaviour? <i>Give reasons for your answer.</i>		
Next Steps		
Are you willing to meet with the Headteacher to discuss your concern? <i>Please circle as appropriate.</i>	<b>YES</b>	<b>NO</b>
Please state any other information you feel is relevant to the processing of this concern.		
<b>Signature</b>		

For use by Headteacher upon receipt of this concern	
Date and time concern received	
Signature of Headteacher	
Actions to be taken <i>e.g. no action, investigation, reclassification as allegation meeting the harms threshold.</i>	