

# West Pelton Primary School & Nursery



## Low Level Concerns Policy and Guidance

**Approved by:**

Governing Body

**Date:** 15 March 2022

**Next review due by:**

March 2023

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## **1. Introduction**

At West Pelton Primary School, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. 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 and Staff Code of Conduct Policies.

## 2. 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, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

## 3. Keeping Children Safe in Education September 2021

The following is taken from [Keeping Children Safe in Education September 2021](#) and identifies what may be considered behaviour relating to low level concern:

### ***What is a low level concern (LLC)?***

*409. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338. 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.*

### ***410. 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;*
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,*
- using inappropriate sexualised, intimidating or offensive language.*

*411. 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.*

*412. 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.*

## 4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

### **Allegation:**

Any adult linked to our school who 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.

### **Low Level Concern:**

Any adult linked to our school who has behaved 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 a referral to the LADO.

### **Appropriate:**

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

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

LLC forms and follow-up information will be stored securely within a locked filing cabinet, 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 Head Teacher or those aware in the senior leadership team.

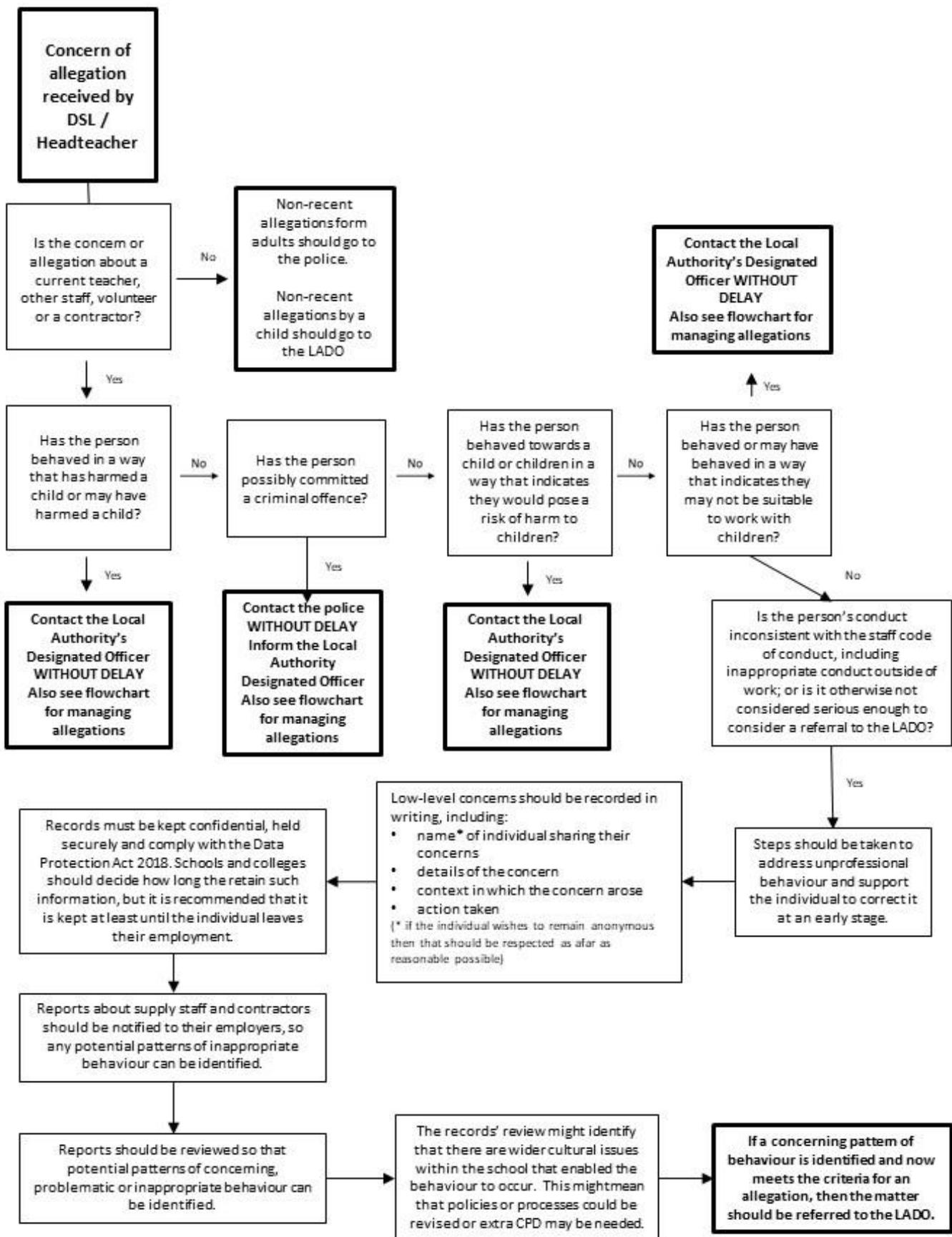
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave West Pelton Primary 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

## 6. Process to follow when a Low-Level Concern is raised



**\*NB – if the concern is about the Headteacher, then the Chair of Governors should be informed.**

## 7. Low level Concerns Reporting Form – West Pelton Primary School

| Your details  |     |    |
|---|-----|----|
| Name (optional)   |     |    |
| Role  |     |    |
| Date and time of completing this form   |     |    |
| Details of individual (including yourself for self-reporting) whom the concern is about   |     |    |
| Name  |     |    |
| Role  |     |    |
| Relationship to the individual reporting eg manager, colleague  |     |    |
| Details of concern  |     |    |
| <p><b>Please include as much detail as possible. Think about the following:</b> 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?</p> |     |    |
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| Details of any children or young people involved  |     |    |
| Name(s)   |     |    |
| Next Steps  |     |    |
| Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.   | Yes | No |
| Please state any other information that you feel is relevant to the processing of this concern.   |     |    |
| Signature   |     |    |
| <b>For use by HT/safeguarding team upon receipt of the concern</b>  |     |    |

|   |  |
|---|--|
| <b>Date and time concern received</b>     |  |
| <b>Signature</b>                          |  |
| <b>Role</b>                               |  |
| <b>Actions to be taken and follow-up.</b> |  |

### Scenario 1

You have noticed that Cara appears to have become subdued over the past few weeks. She is usually bubbly and outgoing but has recently become more withdrawn. When you chat to her, she is reluctant to engage in conversation. You overhear her telling a friend that she will be going on holiday soon and won't be in school for a week. When you check, a holiday request has not been submitted by parents. You ask her about this holiday and she immediately clams up and won't discuss it further. Cara is then missing from school for a week. Parents call to say she has been poorly. When she returns, she continues to be quiet and withdrawn. When you ask her if she is ok, she begins to cry and says that her 'special operation' still hurts. She is too upset to say any more than this.

What is causing you concern?

What do you suspect may have happened?

What should you do?

What is likely to happen next for the school / for the pupil?

### Scenario 2

A parent calls school. He says that his daughter came home very upset from school today. She told him that one of the boys in her class lifted up her skirt with a ruler and put his hand inside her underwear. She did not tell the teacher because she was scared and embarrassed.

What is causing you concern?

What do you suspect may have happened?

What should you do?

What is likely to happen next for the school / for the pupil?

### Scenario 3

A parent asks to speak to you. She is angry and upset. She says that her child told her last night that another teacher grabbed her son by the arm and pulled him. She says her son has marks on his arm that look like finger marks and she has taken a photograph, which she shows you.

What is causing you concern?

What do you suspect may have happened?

What should you do?

What is likely to happen next for the school / for the pupil?

### Scenario 4

A parent approaches you and asks to speak to you in confidence. They have brought their own child and a neighbour's child to school that morning, as they usually do. She tells you that they have heard shouting from the neighbour's house over the last few months. When she has brought it up with her neighbour, she has said that they are just having a few problems at the moment and there have been a few arguments as they try and sort things out. She apologised, especially for the fact that these happened late at night because they are waiting for the children to go to bed so they don't hear. The parent then tells you that she considered calling the police last night because she heard banging and screaming, which went on for a long time. She says she decided not to call the police because she didn't want to interfere in other people's relationships.

What is causing you concern?

What do you suspect may have happened / be happening?

What should you do?

What is likely to happen next for the school / for the pupil?

### Scenario 5

You notice that one of the children appears very tired and disengaged this morning. As you go to work with that group, you become aware of a smell of cannabis that appears to be clinging to the child.

What is causing you concern?

What do you suspect may have happened?

What should you do?

What is likely to happen next for the school / for the pupil?

#### Scenario 6

One child in your class is starting to worry you. Charlie is often late and appears tired, finding it hard to concentrate in lessons. He has begun to ask how long it is until lunchtime. He appears 'grubby'. He has two sisters in the same school.

What is causing you concern?

What do you suspect may have happened / be happening?

What should you do?

What is likely to happen next for the school / for the pupils?

#### Scenario 7

Jay is a lively, popular and intelligent girl. She chats happily about her school and home life. She has a younger brother in the same school. One day, she shows you her new phone. It is an expensive phone and she is very proud of it. When you comment that she must be really grateful that her parents have bought her such a lovely gift, she laughs and says it was a present from her new boyfriend. She says they have been together for a couple of weeks now and he is very kind to her and fun to hang around with. When you ask her about him, she blushes and says that she shouldn't really say any more as he is quite shy and doesn't like her to talk about him.

What is causing you concern?

What do you suspect may have happened / be happening?

What should you do?

What is likely to happen next for the school / for the pupil?

#### Scenario 8

Over lunch time, you are chatting with a group of children. They are all talking about a game they have been playing online. They say that they are all part of a chat room that they use while they are playing the game. There are also two other members of the chat room. One is a pupil of the same age at another local school; all the children know who this is. Through the conversation, it becomes apparent that the second member is not known personally to the children in the group.

What is causing you concern?

What do you suspect may have happened / be happening?

What should you do?

What is likely to happen next for the school / for the pupils?

#### Scenario 9

A very distressed parent comes into school after an early morning visit from the Police. It appears that her child has shared some very inappropriate images on an adult website. The parent had no prior knowledge of this and the child has presented no other safeguarding issues in school.

What is causing you concern?

What do you suspect may have happened / be happening?  
What should you do?  
What is likely to happen next for the school / for the pupils?

#### Scenario 10

John has been struggling with school and constantly appears to be tired, yawning in lessons and starting to fall to sleep in assembly. When talking to him he is only animated when discussing Fortnite the video game. Another child in your class tells you that John is often playing the game before school, starting really early in the morning. John is also started to show a variety of behavioural concerns including getting involved in a fight at lunchtime.

What is causing you concern?  
What do you suspect may have happened / be happening?  
What should you do?  
What is likely to happen next for the school / for the pupils?