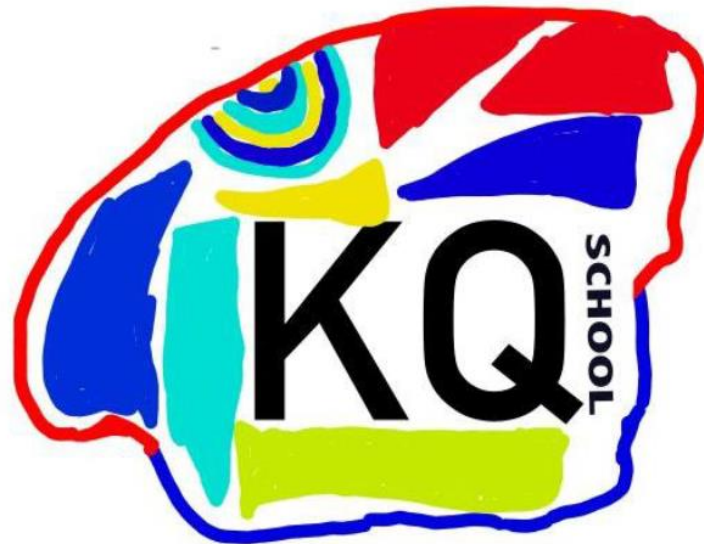


# Low level concerns



<b>Approved by:</b>	Kensington Queensmill Chair of Governors	<b>Date:</b> 13 <sup>th</sup> May 2022
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### 1. Introduction

Safeguarding is of paramount importance at Kensington Queensmill. This includes ensuring that adults who work with our students do so in way which is in line with the school's ethos and culture and matches what is outlined in our staff code of conduct. This policy outlines the systems Kensington Queensmill has in place for managing low level concerns related to staff in school.

### 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 and not in accordance with the school's ethos, culture and code of conduct. A member of staff who has a concern about another member of staff should inform the schools Designated Safeguarding Lead (DSL) or Deputy-DSL, in the DSL's absence in accordance with the school's Safeguarding & Children Protection Policy and protocols.

### 3. Keeping Children Safe in Education 2021

The following is taken from Keeping Children Safe in Education September 2021.

*407. As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote and 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.*

*408. 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; minimize 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?**

*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 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 sexualized, 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
Behaviour which indicates an adult who works with children has: <ul style="list-style-type: none"> <li>• Behaved in a way that has harmed a child, or may have harmed a child;</li> <li>• Possibly committed a criminal offence against or related to a child;</li> <li>• Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.</li> </ul>
Low-level Concern
Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in manner which: <ul style="list-style-type: none"> <li>• Is it not consistent with an organisations Code of Conduct, and/or;</li> <li>• Relates to their conduct outside of work which, even if not linked o a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.</li> </ul>
Appropriate Conduct
Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

#### 5. Storing and use of low-level concerns and follow-up information

All reporting of low-level concerns and follow-up information will be recorded securely on CPOMS, the school's safeguarding system, with access only by DSLs. 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 formalized into more significant concerns resulting in disciplinary or misconduct procedures.

#### 6. Links with other policies

This policy links with our policies on:

- Safeguarding & child protection
- E-safety
- Staff code of conduct
- Complaints and Whistleblowing