



Foundations for Children Low Level Concerns Policy

Croyland Nursery School, Parklands Nursery School,
Camrose Early Years Centre and
Highfield Nursery School

POLICY APPROVED BY:	Full Governing Body
DATE PUBLISHED:	July 2024
DUE FOR REVIEW:	July 2026
TO BE REVIEWED BY:	Cath Draper



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1. Introduction

Foundations for Children Nursery Schools Federation, 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 DSL or Deputy Head or Head Teacher about their concern using a Low-Level Record of Concern Form. If it is an issue regarding the Head teacher please contact the Chair of Governors- details at Reception notices.

3. Keeping Children Safe in Education May 24

The following is taken from Keeping Children Safe in Education May 2024 and identifies what may be considered behaviour relating to 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. 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 108 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:

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 the individual Nursery schools safeguarding systems, 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.

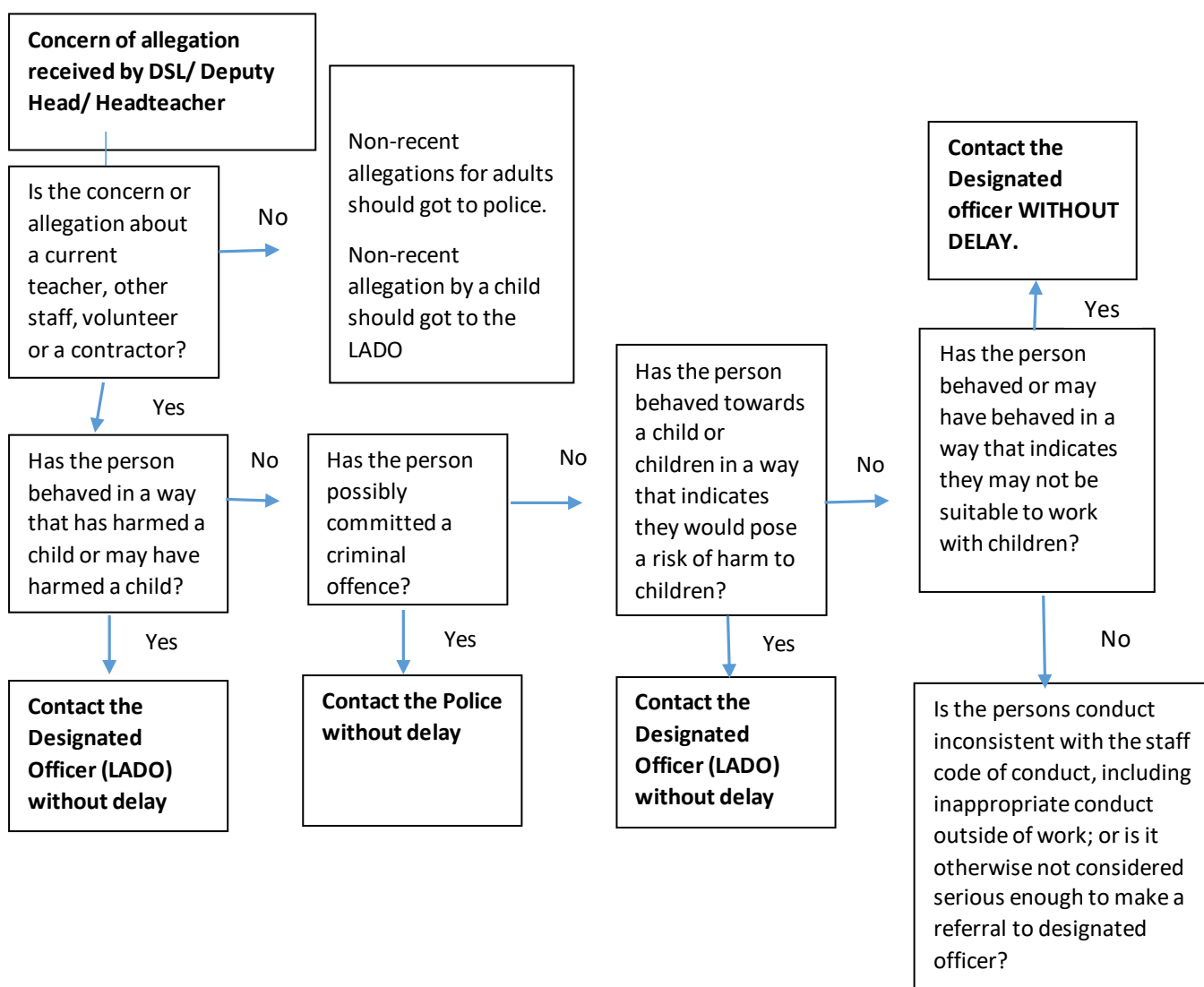
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures. Whenever staff leave, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

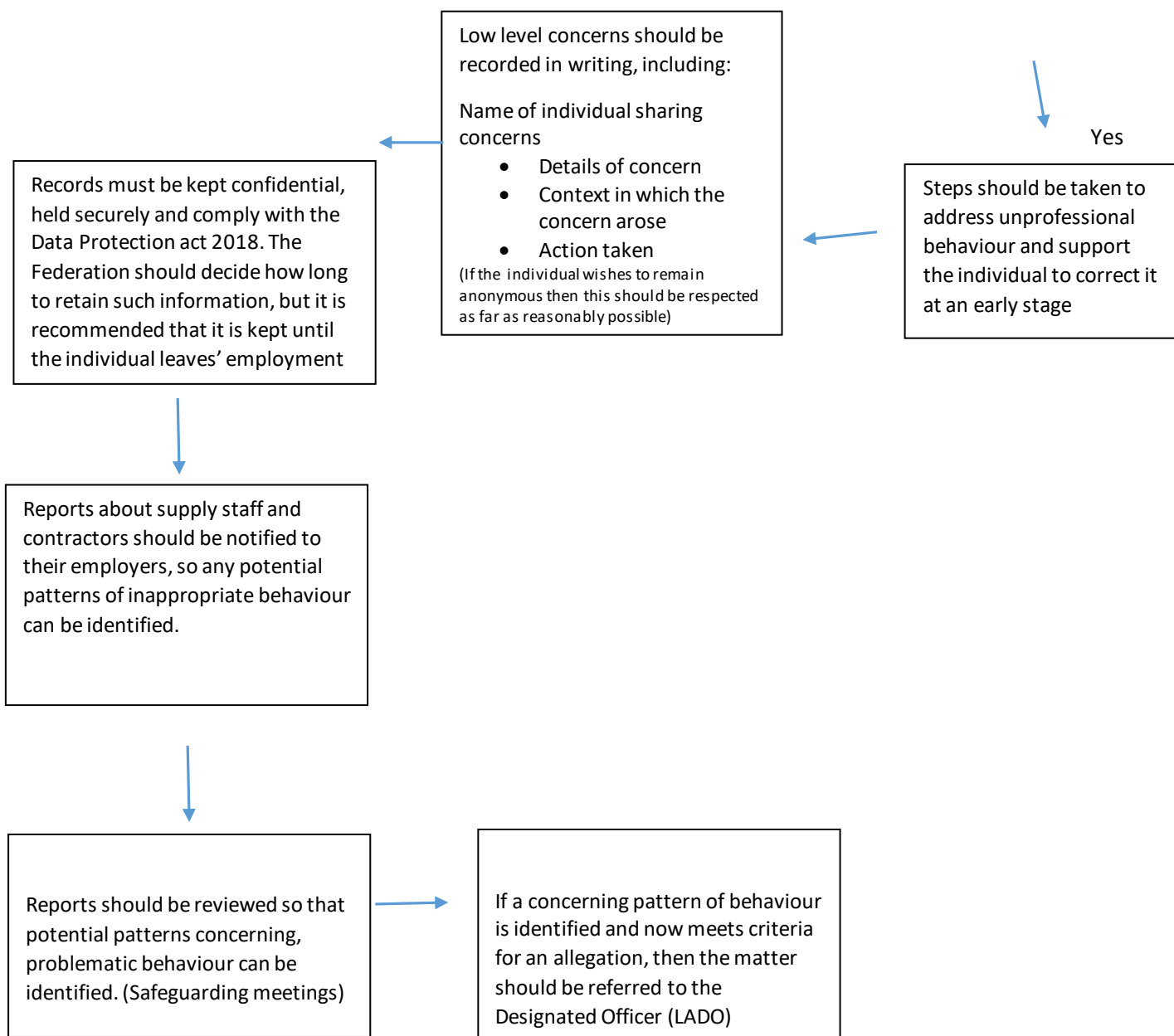
Consideration will be given to:

- (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







7. Low-Level Concerns form

Foundations for Children Nursery Schools Federation

Keeping Children Safe in Education 2021 - Low Level Concerns

This document should be used when ‘low level’ concerns as defined in Section 2 of Keeping Children Safe in Education 2024 are reported. This document does not to replace suspension/formal disciplinary investigations in the event that concerns are either categorised as more serious than low level or when formal disciplinary procedures are required in relation to the low-level concern.

<p>1. Name of individual raising the concern</p> <p><i>Leave blank if concern was raised anonymously or the individual wishes to remain anonymous</i></p>	
<p>2. Date the concern was raised</p>	
<p>3. Name and role of individual about whom concern has been raised</p>	
<p>4. Details of the concern(s) reported (give description and context)</p> <p><i>A ‘low level’ concern is any 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</i></p>	



<p><i>adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the allegations threshold set out in Section 1 of Part 4.</i></p>	
<p>5. Details of steps have been taken to investigate this concern</p> <p>Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. You will need to review your Code of Conduct and Safeguarding Policies to determine if there has been a breach.</p>	
<p>6. Set out the Individual's response to the concern</p>	
<p>7. Is this concern 'low level' or should it be treated as an allegation against staff and managed in accordance with Section 1 of Part 4?</p>	



<p><i>To reach this decision, consider the information set out in 5 and 6 above. If you are unsure, seek advice from your HR and/or safeguarding advisors and/or discuss the matter with your LADO. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO</i></p>	
<p>8. Have ‘low level’ or other concerns been raised about this individual previously?</p> <p><i>If so, please provides dates, brief details and relevant file/document reference for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the threshold set out in Section 1 of Part 4.</i></p>	<p>Yes [] No []</p>
<p>Details of further action required</p> <p><i>Action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.</i></p>	
<p>Completed by:</p>	<p>Name: Position:</p>
<p>Date:</p>	
<p>Signature:</p>	