



# Pensilva Primary School

## Low Level Concerns Policy

<b>Date of Adoption</b>	
<b>Review Date</b>	Autumn 2026

### Chronology

<b>Date</b>	<b>Action</b>
8/05/23	Policy written by MD (headteacher)
24/05/23	Approved by Full Governing Body
05/09/24	Policy reviewed by MD (headteacher)
23/10/2024	Approved by Full Governing Body
Oct 2025	Reviewed by headteacher
	Adopted by full governing body

**Signed:**

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## 1. Introduction

At Pensilva Primary School, we aim to create an open and transparent culture where all concerns about all adults involved with our schools 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 the school are clear about professional boundaries. Professional behaviours are outlined in the school's code of conduct and are in line with the school's ethos.

Creating a culture in which all concerns about adults (including those that do not meet the threshold of an allegation) are shared responsibly with the designated member of staff. All concerns should be recorded and dealt with appropriately. If implemented correctly, this should encourage a more open and transparent culture within the school, thus enabling the school to identify concerning behaviour early; minimise the risk of abuse; and ensure that adults working in the school do so in a professional manner.

*This policy should be read alongside our Safeguarding and Child Protection, Whistleblowing, Grievance 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. Pensilva Primary School is committed to cultivating a culture of staff being able to, in a safe and professional manner, challenge behaviours that cause offense or cause an atmosphere of feeling uncomfortable.

Any member of staff who has a concern about the action/s of another member of staff, volunteer or contractor, or who on reflection, recognises that their own actions could have been viewed as concerning should inform the Head Teacher. In cases where a member of staff has a concern regarding the Head Teacher, these concerns should be taken to the Chair of Governors.

Pensilva Primary School recognises that a low-level concern about a member of staff may be raised by an external agency, community or family member. In this instance it will be the Headteacher's responsibility have an open and honest discussion with the member of staff.

### 3. Keeping Children Safe in Education, September 2024

The following is taken from Keeping Children Safe in Education September 2024 and identifies what may be considered behaviour relating to low level concern:

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

*426. 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.*

*427. 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.*

*428. 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.*

*429. 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.*

**At Pensilva Primary School, we have established a safe environment for our pupils to remain safe from harmful adults. Our Code of Conduct is robust and incorporates all of the above guidance. However, this guidance is to ensure staff/volunteers/partners are responsible for their actions at all times.**

**Examples that may need to be reported:**

- Staff that befriend families online who they have met through their role within Pensilva Primary School**
- Staff that come to mind in Safer Recruitment/Safeguarding training ('flying low of radar')**
- Staff who shout or speak disrespectfully to or about children**
- Staff that adopt risky 'alter egos' online**

- Staff that are online 'influencers' and use their role within Pensilva Primary School to meet their own needs (for example, to promote their own business or enterprise)
- Staff who 'like' or 'share' inappropriate/extreme material or opinions on social media (for example, making, liking or sharing derogatory comments about individuals or groups with protected characteristics)
- Staff that are unable to safeguard their own children
- Staff who display coercive/controlling behaviour outside or inside the workplace
- Staff that do not role model the ethos of modern Safeguarding in Education

Staff should be assured that Pensilva Primary School understands that dynamics/relationships within families, neighbours and friendship groups can break down and we will be mindful of assessing delicate personal details. Concerns of this nature will be handled with respect alongside your human right to have a 'personal life' and protect from malicious allegations. However, any actions that impact on the wellbeing of children and/or vulnerable adults cannot be ignored.

#### **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
- \*possibly committed a criminal offence against or related to a child
- \*behaved towards a child or children in a way that indicates he or she 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 adult linked to our school who has behaved in a way that:

- \*is inconsistent with the staff code of conduct and ethos of Pensilva Primary School including inappropriate conduct outside of work
- \*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**

Low Level Concerns (LLC) information will in the first instance be informal. However, if once a staff member has challenged low level behaviour and it continues, the headteacher will address the behaviour/conduct. A record of these discussions will be stored securely within the school's safeguarding systems, with access only by the Headteacher and DSL.

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 and DSL. There may be instances where behaviour and conduct is witnessed by multiple staff members. All staff are responsible for addressing and reporting low level behaviour concerns as individuals and not as a group.

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. Should staff leave Pensilva 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**

The Headteacher will discuss reported concerns with the member of staff. It may not be necessary to name the complainant unless the concern is escalated to formal proceedings.

The Headteacher will discuss

- what changes needs to be made
- agree a support plan if required
- any further action
- consequences of repeated behaviour/actions
- time scale (normally immediate)

The Headteacher will be mindful of disguised compliance, where the staff member says what is required but minimises said behaviours/actions and little changes.

The member of staff will be directed not to discuss with colleagues and attempt to investigate where the reported concern came from.

Please remember this policy is focused at keeping children, community, and staff safe.

## Appendix 1 – Flowchart to show process once a concern has been raised

