

LOW LEVEL CONCERNS POLICY

BRAMHALL HIGH SCHOOL

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1. ABOUT THIS POLICY

This policy is based on statutory guidance from the Department for Education. Schools, local authorities and FE colleges should have regard to it when carrying out duties relating to handling allegations against teachers and other staff.

2. LEGISLATION THIS GUIDANCE RELATES TO

- The Children Act 1989
- Section 175 of the Education Act 2002 (local authorities, governing bodies of maintained schools and institutions in the further education sector)
- Section 157 of the Education Act 2002 and the Education (Independent School Standards) (England) Regulations 2010
- The Children Act 2004
- Section 11 of the Children Act 2004 (other agencies)
- Sections 141F, 141G and 141H3 of the Education Act 2002.

3. WHO THE GUIDANCE IS FOR

All schools, local authorities, governing bodies and the FE sector. This guidance relates to all adults working with children and young people, whether in a paid or voluntary position including those who work with children on a temporary, supply or locum basis.

This policy is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education. This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in our Child Protection & Safeguarding Policy and would not result in a referral to the Local Authority Designated Officer (LADO).

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to, and dealing with, any concerns in a timely manner to safeguard the welfare of children.

4. DEFINITION OF LOW-LEVEL CONCERNS

The term 'Low-Level' concern is any concern – no matter how small – that an adult working in, or on behalf of, the school may have acted in a way that:

- Is inconsistent with Bramhall High School's 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 designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children.
- Having favourites.
- Taking photographs of children on a personal device or mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language.
- Relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- Is not consistent with the school's Staff Code of Conduct.

5. SHARING LOW-LEVEL CONCERNS

We recognise the importance of creating a culture of vigilance, openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Have clear policies and procedures.
- Empowering staff to share any low-level concerns.

6. EMPOWERING STAFF TO SELF-REFER

- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

7. REPORTING A LOW-LEVEL CONCERN

Low level concerns about a member of staff should be reported to the Headteacher or DSL as per the school's Child Protection & Safeguarding policy and procedures.

KCSIE 2026 allows schools flexibility on who collects the initial report, but mandates that the Headteacher must hold ultimate oversight and final sign-off on how the concern is resolved.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO/Designated Officer, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Head of School or DSL.

If the concern is about the DSL, this should be reported to the Headteacher. If the concern is about the Headteacher, this should be reported to the Chair of Governors.

Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Each incident will be recorded internally by DSL.

Staff should use the school's Low-Level Concerns Reporting Form (Appendix 1).

8. RESPONDING TO LOW-LEVEL CONCERNS

If the concern is raised via a third party, the headteacher will collect evidence where necessary by:

- Speaking directly to the person who raised the concern, unless it has been raised anonymously.
- Speaking to the individual involved and any witnesses.

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Repeated low level concerns may be referred to the LADO.

- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual safeguarding and child protection processes.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

9. RECORD KEEPING

All low-level concerns will be recorded in writing (Appendix 1). In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer to any pattern of inappropriate behaviour can be identified.

10. REVIEWING A LOW-LEVEL CONCERN

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings.
- Management Advice, including recommendations for training.
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates volunteers, or any other concerns arise, school can contact the LADO for further advice.

11. REFERENCES

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

12. APPENDIX 1

LOW-LEVEL CONCERN FORM

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with Bramhall High School's Staff Code of Conduct, including inappropriate conduct outside of work, **and** conduct that does not meet the allegation threshold as detailed in the school's Child Protection & Safeguarding Policy.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated and returned to the Headteacher/DSL.

Details of concern (including date/time of concern): Name of adult you are concerned about:
Print your name:_____ Your signature:_____ Date:_____Time:_____

13. APPENDIX 2

FLOW CHART TO MANAGING ALLEGATIONS

