



TERRA NOVA  
SCHOOL

## Low-Level Concerns Policy

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## 1. Introduction

Terra Nova believes that all concerns should be identified, spoken about and recorded as part of a robust approach to safeguarding. This policy details our processes for the early notification of and prompt and appropriate management of all low-level concerns (LLC) about adults who work with children i.e. concerns that do not meet the harms threshold. This includes self-reporting by adults, or adults sharing such concerns about the behaviour of other adults.

For the purposes of this policy, 'staff' should be interpreted very widely to mean anyone associated with the organisation – i.e. whether working in or on behalf of the organisation, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.

The purpose of this policy is to support and promote a culture of openness, trust and transparency in which the expected behaviour, as set out in the Staff Manual, is constantly lived, monitored and reinforced by all staff. Safeguarding and promoting the welfare of children is everyone's responsibility.

## 2. Allegations that may meet the Harms Threshold

All allegations that may meet the harms threshold must be reported directly to the Headteacher or if the allegation is regarding the Headteacher it should be reported to the Chair of Governors.

The term 'allegation that may meet the harms threshold' means that it is alleged that a person who works with children 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 they 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<sup>1</sup>

Keeping Children Safe in Education (KCSIE) states that:

- in terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college; and
  - the final bullet above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, which is known as transferable risk; and
  - where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken, and if in doubt, advice sought from the LADO.

The Headteacher on all such occasions will discuss the content of the allegation with the LADO. Following the initial telephone discussion the allegation will be put in writing and sent to the LADO. In the case of serious harm, the police will be informed. The School will follow the procedures for managing allegations against staff, which are contained in Appendix 4 of the school's Safeguarding & Child Protection Policy

**Staff do not need to determine whether a concern is 'low-level' or meets the harms threshold, this decision is made by the Headmistress.**

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<sup>1</sup> This definition is used in KCSIE, paragraph 338

### 3. Low-level concerns

The term 'low-level concern' does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the harms threshold.

A low-level concern is any concern that an adult 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 allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO on a no-names basis if necessary.

**All low-level concerns should be shared directly with the Headteacher as soon as reasonably possible** and, in any event, within 24 hours of becoming aware of it. Notwithstanding this, it is never too late to share a low-level concern. A concern can be shared either verbally or in writing and 'Low-level concern forms' are available in the staff room and main reception for anyone wanting to use a form (see Appendix B). If the concern relates to the Headteacher, then the concern should be shared with the Chair of Governors.

**All low-level concerns should be handled by following the flowchart of actions in Appendix A unless advised otherwise by the LADO and/or an external agency.**

### 4. Record keeping of a low-level concern

All low-level concerns should be recorded on the digital 'Low-level concern file' which sits in the HR filing and is accessible by the Headteacher, DSL and HR Coordinator. A note will be placed in the HR file of the person about whom the concern has been raised, stating that there is a recorded LLC.

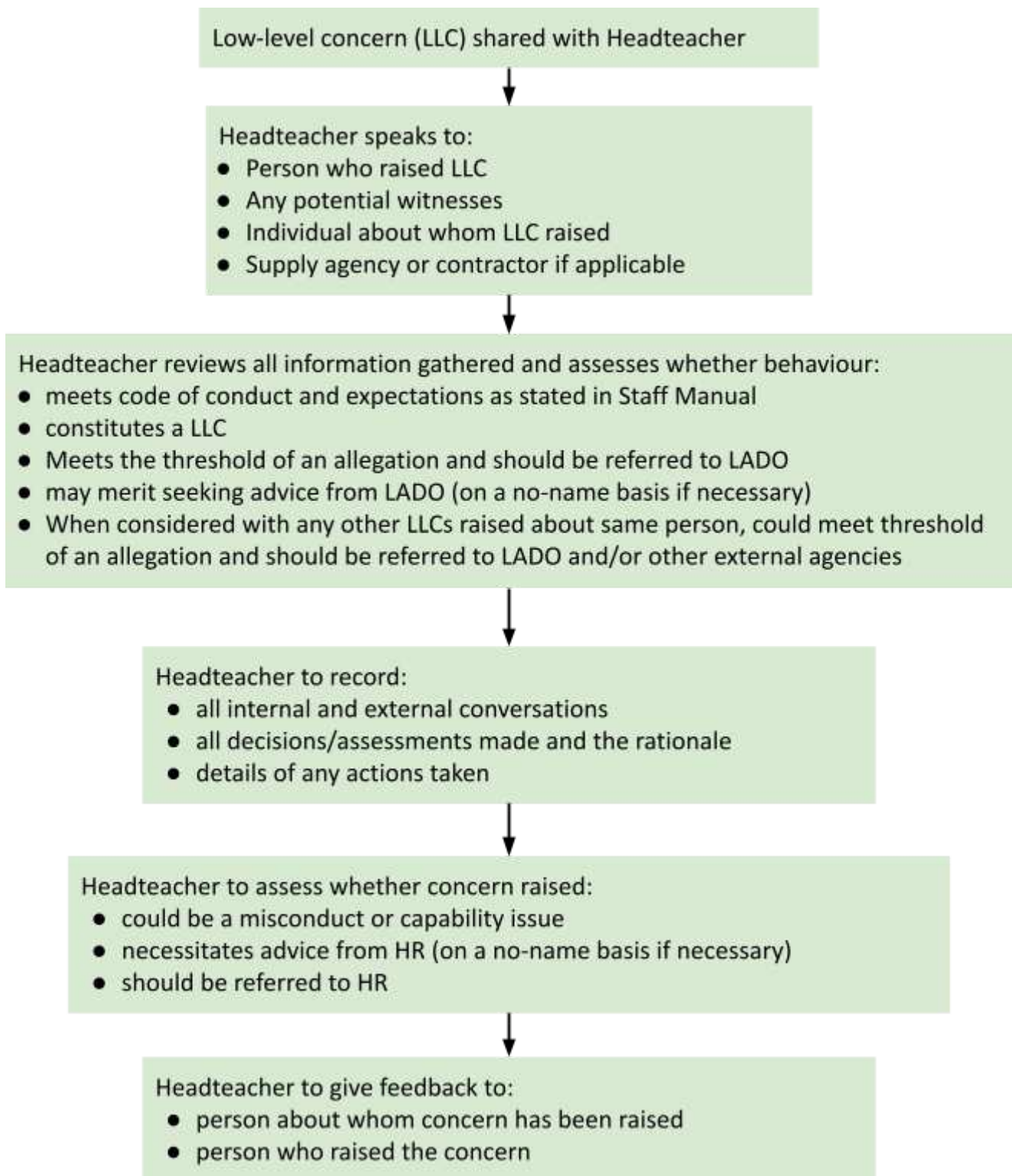
When a concern is shared verbally, the Headteacher will make a written record of the conversation either contemporaneously or immediately following the discussion. The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated by the Headteacher.

The Headteacher, DSL and Safeguarding Governor will review an anonymised version of the LLC file on a termly basis and a record of these reviews will be made in the Safeguarding Committee minutes.

## 5. Self-reporting of a low-level concern

Staff are also strongly encouraged to share a concern about themselves if they experience a compromising situation or feel their behaviour has or could be perceived to be below the expected standards. Self-reporting can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness of actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

## 6. Appendix A - Low-level concern flowchart



## 7. Appendix B - Low-level concern form

| Low-level Concern Form                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| <p>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:</p> <ul style="list-style-type: none"> <li>• is inconsistent with the Terra Nova staff code of conduct, including inappropriate conduct outside of work, and</li> <li>• does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.</li> </ul> <p>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).</p> <p><b>Please submit this form to the Headteacher.</b></p> |                    |
| Name of person reporting concern:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                    |
| Department & Role:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                    |
| <p><b>Details of concern:</b></p> <p><i>include full name and role of person(s) about whom you have a concern</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                    |
| Date & Time:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Signature:         |
| Received by:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Date & Time recvd: |

