



## **Baldwins Hill Primary School Low Level Concerns Policy**

This policy was adopted by the LGB in: November 2024

The policy will next be reviewed in: November 2025

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Growing Great...

Respect, Compassion, Courage, Responsibility

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## 1. Introduction

At Baldwins Hill, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Behaviour, Conduct and Disciplinary Policy. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

## 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 should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

## 3. Keeping Children Safe in Education September 2024

For the definition of a Low Level concern, see KCSIE 2024 Part Four, Section two: Concerns or allegations that do not meet the harm threshold'

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extension://efaidnbmnnnibpcajpcglclefindmkaj/https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping\_children\_safe\_in\_education\_2024.pdf

## 4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

### **Allegation**

Behaviour which indicates that an adult who works with children 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 they may pose a risk of harm to children.

### **Low-Level Concern**

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- Is not consistent with an organisation's Code of Conduct, and/or
- 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.

### **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

Low-Level Concern forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by Senior leaders. 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 Baldwins Hill 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.

KCSIE 2024:

### **What a low-level concern is**

433. 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:

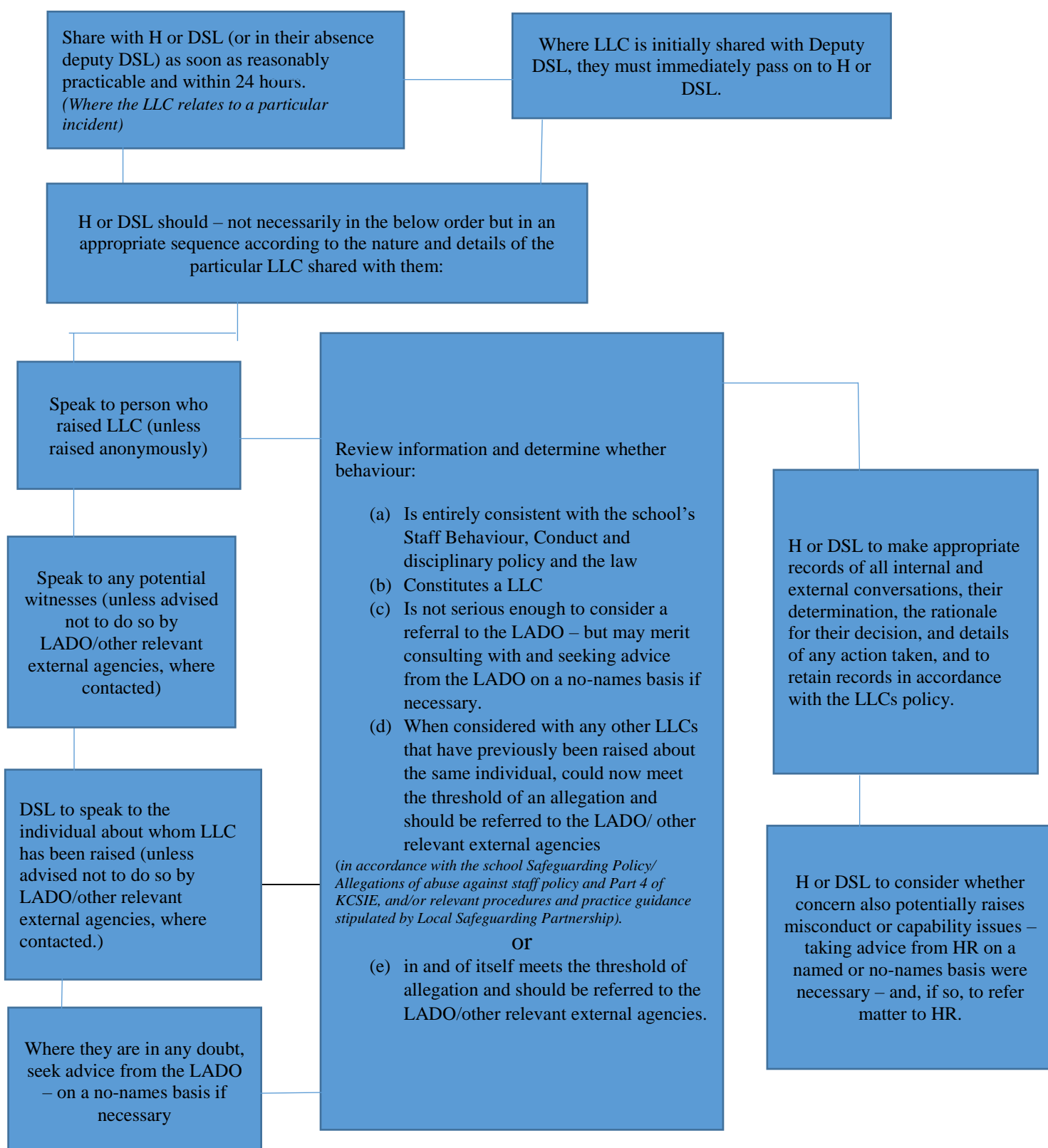
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
  - does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
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## 6. Process to follow when a low level concern is raised

### Diagram – Sharing Low Level Concerns (LLCs) – action required by staff, Headteacher (H) or Designated Safeguarding Lead (DSL)

If member of staff has an **allegation that may meet the harm threshold** – they should follow the procedure in the Safeguarding Policy/ Allegations of abuse against staff policy. If member of staff has what they **believe** to be a concern that does not meet the harm threshold – i.e. LLC – they should take the below action.

**KCSIE now requires low-level concerns to be shared with the headteacher – unless they relate to the Headteacher – as per paragraph 70 of KCSIE.**



## 7. Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2024:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy/>

## 8. Low Level Concern Form – appendix 1

This form will be available to staff via:

- DSLs
- The Senior Leadership Team

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**Appendix 1**

**Baldwins Hill Low Level Concerns**

**Low level Concern Form**

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with the Partners in Learning Staff behaviour and Conduct, and/or
- 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.

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.

**Details of concern**

Name of Staff member:	Role:
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Signed:	Time and Date:
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Received by:  
Action Taken:

At: (time)

on: (date)

Signed:

Time and Date:

This record will be held securely in accordance with the Baldwins Hill low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Baldwins Hill may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.