



**Inspiring Futures  
through Learning**

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**Staff Low Level Concerns Policy\***

September 2023 - September 2025



<b>Policy name:</b>	IFtL Staff Low Level Concerns Policy
<b>Version:</b>	V1
<b>Date relevant from:</b>	September 2023
<b>Date to be reviewed:</b>	September 2025 <i>This policy will be reviewed every two years unless legislation dictates otherwise. Recent changes in Legislation will need to be read and used to review this Policy.</i>
<b>Role of reviewer:</b>	IFtL Head of Safeguarding, Health, Children & Families.
<b>Statutory (Y/N):</b>	Y
<b>Published on website*:</b>	1B

<b>Policy level**:</b>	1
<b>Relevant to:</b>	All employees through all IFtL schools and departments
<b>Bodies consulted:</b>	Employees Trade unions School / department governance bodies
<b>Approved by:</b>	IFtL Board of Trustees
<b>Approval date:</b>	29 <sup>th</sup> August 2023

#### Key:

#### \* Publication on website:

##### IFtL website

1	Statutory publication
2	Good practice
3	Not required

##### School website

A	Statutory publication
B	Good practice
C	Not required

#### \*\* Policy level:

- Trust wide:
  - This one policy is relevant to everyone and consistently applied across all schools and Trust departments with no variations.
    - o *Approved by the IFtL Board of Trustees.*
- Trust core values:
  - This policy defines the values to be incorporated fully in all other policies on this subject across all schools and Trust departments. This policy should therefore form the basis of a localised school / department policy that in addition contains relevant information, procedures and / or processes contextualised to that school / department.
    - o *Approved by the IFtL Board of Trustees as a Trust Core Values policy.*
    - o *Approved by school / department governance bodies as a relevantly contextualised school / department policy.*
- School / department policies
  - These are defined independently by schools / departments as appropriate



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## ***Low-Level Concerns Policy***

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### Introduction

At IFtL and across all our schools and ITT, 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 Trust, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have (See appendix 1).

### Summary

It may be possible that a member of staff acts in a way that does not cause risk to children (LADO referral) but is inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher or DSL about their concern using a Low-Level Record of Concern form. If the Head Teacher or DSL cannot be contacted, the Deputy Headteacher should be informed. The Head Teacher, Deputy Head Teacher or DSL will record this information on Staff Safe.

A low-level concern form should also be completed in all cases.

The form will be available on the school system or directly from:

- The Head Teacher
- Deputy Head Teacher
- Designated Safeguarding Lead

It can also be requested via email from the above people.

**We adhered to all; the recommendations and requirements made within KCSIE 2023 section 2: Section Two: Concerns and or allegations that do not meet the harm thresholds (pages 100 to 104).**

### Low level Concerns

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 (including supply teachers, volunteers and contractors) 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.

At IFtL and all our schools, we believe in the importance of creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:



- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution (KCSIE 2023, Para 426)

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 pupils.

(KCSIE 2023 para 426)

These concerns would commonly not have any direct harm to children but may be the result of carelessness or thoughtlessness. They may or may not meet the LADO threshold so always refer if in doubt.

Please refer if in doubt always refer and the Head teacher, deputy head teacher and/ or DSL will make the decision if it meets the LADO thresholds.

#### Investigation of low-level concerns

The Head Teacher, deputy or DSL will always follow up on all low-level investigations. They should talk to the person reporting the concern (unless this is anonymous) and follow up with the person who the concern is raised about and any witnesses.

The Head Teacher will consider the full details of concerns, if they are unsure if the allegation meets the harm criteria or not then they will always consult the LADO for advice and guidance. IF in doubt, always call the LADO and Victoria Blackmore (vblackmore@iftl.co.uk)

If the concern is deemed low level, they will gather information and take any appropriate action, this may involve a disciplinary, retraining or rewriting policies.

The record will always be kept on the person's personnel file and in Staff Safe and the staff member must be made aware of this. In the event of other allegations being made which meet the Harm criteria for a referral to the LADO, the Head Teacher will share this information fully with the LADO as this will identify any patterns or escalation in behaviour.

In respect of contractors or organisations using school premises, the Manager/DSL of the organisation will be made aware so that they can log the information as a low level concern.



## 1. Clarity around Allegation vs Low-Level Concerns vs Appropriate Conduct

Keeping children safe in education 2023 gives clear guidance around these concerns

### **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.

Storage and use of Low-Level Concerns and follow-up information

Low-Level Concern forms (Appendix 2) and follow up information will be stored securely within the schools safeguarding Staff Safe systems and on an individual's personnel file, with access only by the core management 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 in their absence the deputy and the DSL.

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 IFtL school or ITT, 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 and/ or shared. The staff member will be made aware of the decision.

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.



Organisations or Individuals using school premises and Contractors.

The Head teacher may receive a low level concern relating to an incident that happened when a contractor was completing contracted work or an individual/organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding concern, schools and colleges should follow their safeguarding policies and procedures, including informing the employer, LADO or companies DSL. The school will ensure this information is stored and will consider a risk assessment based on the concern raised.

### **SAFEGUARDING STATEMENT**

Safeguarding is everyone's business. IFtL is committed to ensuring that all our children, young people and adults are safe and feel safe.

If you have any concerns at all, raise them **immediately** with the local DSL or IFtL's Head of Safeguarding, Health, Children and Families: [vblackmore@iftl.co.uk](mailto:vblackmore@iftl.co.uk)

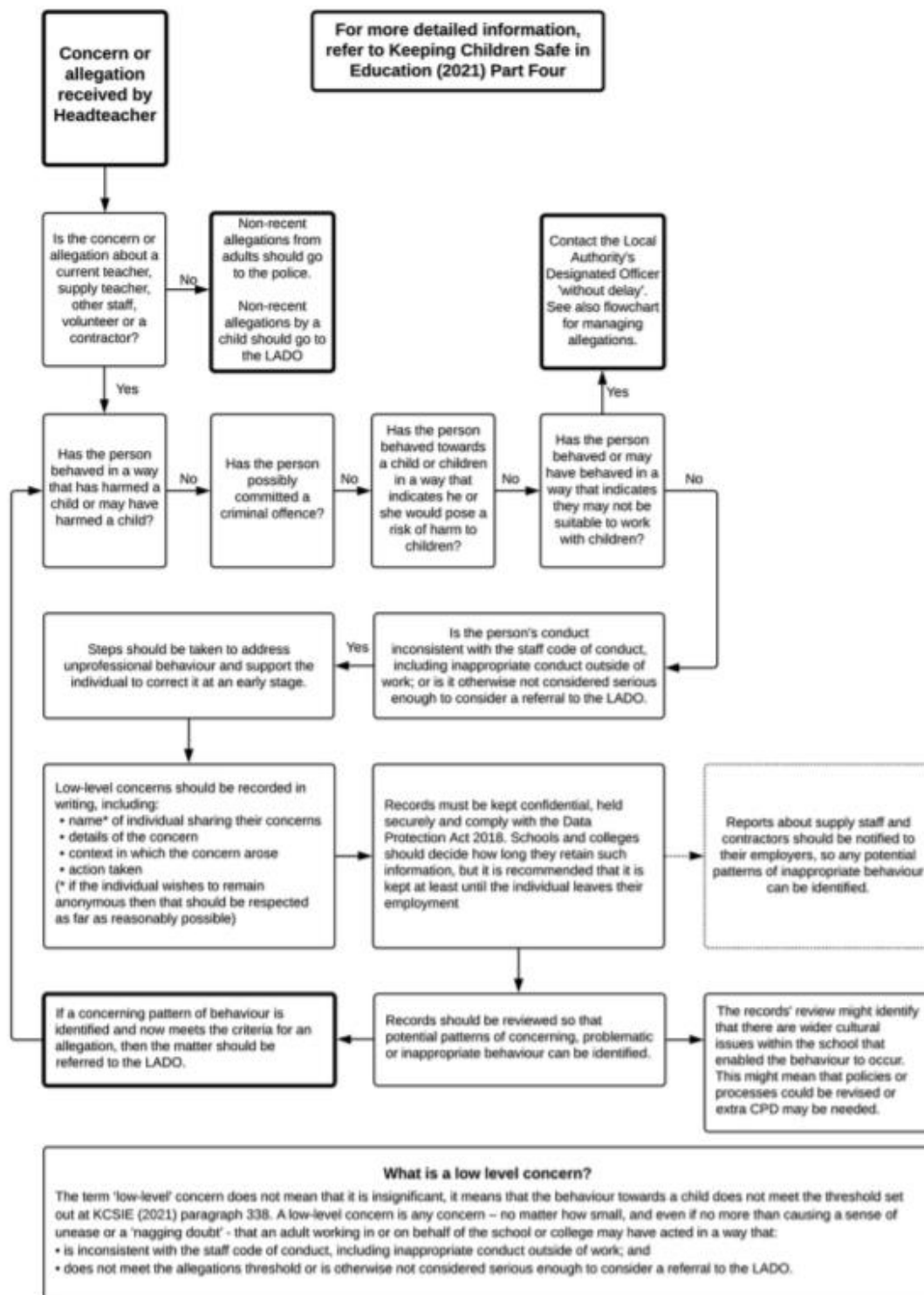
For further contact details, see:

- IFtL Child Protection and Safeguarding policy
- IFtL Whistleblowing policy

<https://www.iftl.co.uk/policies/>



## Appendix 1



NB: As yet 2023 KCSIE flow chart not available; however the process to follow remains in KCSIE 2023



## Appendix 2 - Low-Level Concern Form

To be uploaded and recorded on Staff Safe

Low-Level Record of Concern Regarding a Staff Member	
<p>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:</p> <ul style="list-style-type: none"><li>• Is not consistent with our Code of conduct, and/or;</li><li>• 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 an adult’s suitability to work with children.</li></ul> <p>Where possible please speak with the Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head Teacher. When completed, please pass this form to the Head Teacher. If the concern is about the Head Teacher, please pass on to the Chair of governors.</p> <p><b>Remember a low-level concern is different to an allegation.</b></p>	
Date of low-level concern:	
Member of staff involved (Including Contractors, supply staff, volunteers and individuals using the premises) :	
Concern information:	
Reported by:	
Discussion with LADO: Date and details of discussion	
Outcome:	

