



“Every Opportunity for Every Child”

Alpha Trust

Management of Low-Level Concerns Policy



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Alpha Trust Management of Low-Level Concerns Policy

1. Introduction

This Policy must be used by the appropriate Alpha Trust Executive Principal/Principal/Headteacher/Head of School/Associate Principal and by the relevant school's Designated Safeguarding Lead (DSL) when a low-level concern is raised against an employee, school volunteer, contractor or person involved in a school letting.

All staff, or any other school-associated person, must refer to this Policy should they have a low-level concern regarding Safeguarding.

2. Definitions – Allegations, Low-Level Concerns, Appropriate Conduct

The spectrum of adult behaviours regarding safeguarding:

Allegation - may meet the harm threshold*

An adult who works with children has behaved in a manner considered to be misconduct or gross misconduct or is statutorily prohibited by:

- Behaving or may have behaved in a way that has harmed a child or may have harmed a child; and/or
- Having possibly committed a criminal offence against or related to a child or member of staff; and/or
- Behaving or may have behaved towards a child or children in a way that indicates the adult may pose a risk of harm to children; and/or
- Behaving or may have behaved in a way that indicates they may not be suitable to work with children.

[*As stated in the latest version of KCSIE, the harm test is explained on the DBS website: [Making barring referrals to the DBS - GOV.UK \(www.gov.uk\)](https://www.gov.uk/making-barrings-referrals-to-the-dbs)]

Low-Level Concern

This does not mean that the concern is insignificant, it only means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- Is inconsistent with the Alpha Trust 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**, and on a no-names basis if necessary.

Appropriate Conduct

- Behaviour which is entirely consistent with the Alpha Trust Staff Code of Conduct, and the law.



Examples of low-level concern behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their 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

3. Alpha Trust Safeguarding Framework

This Policy sits with the Alpha Trust Safeguarding and Child Protection Policy and local School Child Protection Procedures.

If the allegation harm threshold is met, the Alpha Trust Procedure for Dealing with Allegations Against Adults in School is implemented.

All staff must refer to this Policy should they have a low-level concern with regards to Safeguarding. It enables staff, and other school-associated adults, to share any concerns with the relevant Executive Principal/Principal/ Headteacher/Head of School/Associate Principal and by the school's Designated Safeguarding Lead (DSL)

4. Purpose of this Policy

The purpose of this Policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviours, which are set out in the Alpha Trust Staff Code of Conduct, are constantly lived, monitored and reinforced by all staff.

To achieve this:

- All staff must be clear about, and confident enough, to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, **in themselves and others**, and the delineation of professional boundaries and reporting lines
- Staff are empowered to share any low-level concerns with the relevant Executive Principal/Principal/ Headteacher/Head of School/Associate Principal directly or via the school's Designated Safeguarding Lead (DSL) by **ensuring all staff are able to interpret the sharing of such concerns as a neutral act**
- Staff are empowered to self-refer
- Unprofessional behaviour is addressed, and support given, to the individual to correct behaviour at an early stage
- Concerning, problematic or inappropriate behaviour, including any perceived patterns, is identified and then weighed up to determine whether it may need to be consulted upon on a no-name basis, if appropriate, with the LADO and/or referred to the LADO;
- Responsive, sensitive and proportionate handling of such concerns, when they are raised, will be provided by senior leaders
- Any weaknesses in the organisation's safeguarding system will be identified.

5. Aims of this Policy

- To raise the awareness of all staff of the need to safeguard children and provide all staff with the necessary information and guidance allowing them to meet their responsibilities;
- To ensure consistent good practice, emphasising the need for good levels of communication between all members of staff as well as structured procedures which all members of staff will follow in the case of raising a low-level concern.
- To provide an environment in which staff feel able to share any concern they may have regarding a member of staff's, or other school-associated adult's, manner.
- To ensure children and young people are within a safe environment in which they feel secure and valued, and able to approach adults if they need help, knowing they will be listened to.

6. Importance of sharing a low-level concern

School personnel do not need to be able to determine in each case whether their concern is a low-level concern or not, or whether it meets the harm threshold for referral to the LADO. That is the decision of the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal and the relevant school's Designated Safeguarding Lead (DSL).

Any concern must be shared: the welfare of the child is paramount.

7. Reporting

It is important to share any concern with the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal and the relevant school's Designated Safeguarding Lead (DSL).

If the concern is about the DSL, it should be shared with the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal.

If the concern is about the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal, the concern should be reported to the CEO. If the concern is about the CEO, the Chair of Trustees, should be informed.

All Low-level concerns should be reported in writing; Appendix A has an example of a Low-Level Concern Reporting Form

Should the concern be reported verbally, the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal must make an appropriate record of the conversation, either at the same time or immediately following the discussion.

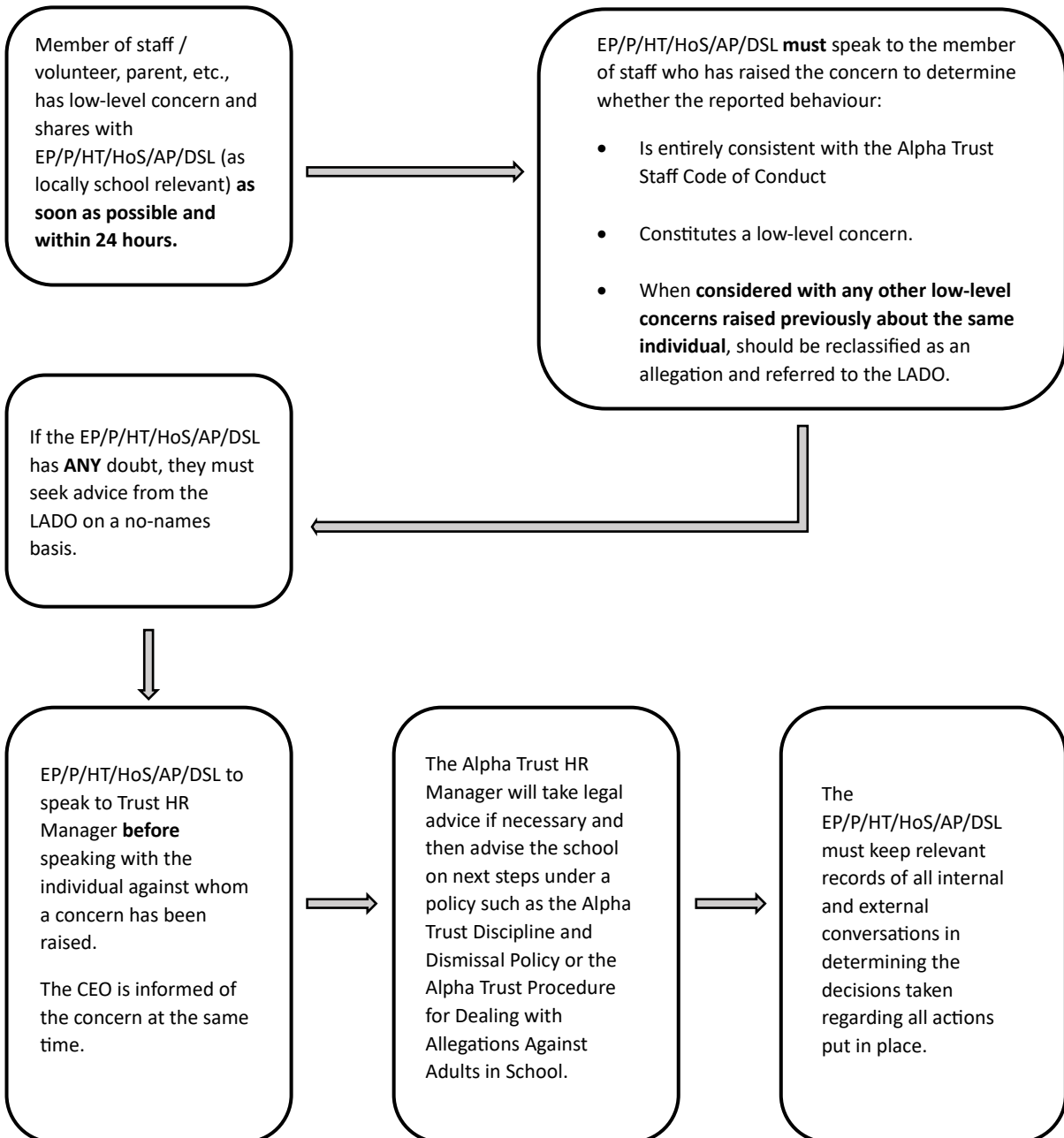
If the concern has been raised via a third party, the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal and DSL should collect as much evidence as possible by speaking directly:

- to the person who raised the concern (unless it has been raised anonymously)
- to the individual involved
- any witnesses.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or the Trust, that concern should be shared with the Executive Principal/Principal/

Headteacher/Head of School/Associate Principal, DSL and CEO, if appropriate. The concern will be recorded in accordance with this policy and the employer notified about the concern, especially to allow for any potential patterns of inappropriate behaviour to be identified.

Flow Chart for Raising Low-level Concerns



8. Responding to a Low-Level Concern

Upon receipt of the low-level concern the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal, or the DSL, must then:

- Speak to the member of staff who has raised the concern to gather all information
- Review the information and determine if the behaviour is:
 - a. Consistent with the Alpha Trust Staff Code of Conduct
 - b. Constitutes a low-level concern
 - c. Is serious enough to consider a referral to the LADO
 - d. If considered with any other previous low-level concerns raised, it may be reclassified as an allegation and referred to LADO and / or other external agencies
- If the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal or the DSL has any doubt, the DSL should seek advice from the LADO on a no-name basis if necessary
- The Executive Principal/Principal/ Headteacher/Head of School/Associate Principal or the DSL must not speak to any other members of staff without having consulted the Trust HR team. If a LADO referral is to be made, Executive Principal/Principal/ Headteacher/Head of School/Associate Principal or the DSL must not speak to any members of staff without the LADO's agreement.
- Subject to further information being gathered, and if appropriate, the matter may be managed in accordance with the Alpha Trust Discipline and Dismissal Policy or the Alpha Trust Procedure for Dealing with Allegations Against Adults in Schools.

9. Record-keeping

All low-level concerns should be recorded in writing by the Executive Principal/Principal/ Headteacher/Head of School/Associate Principal and/or the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, however, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Safeguarding Lead and, where appropriate, the Alpha Trust HR Manager, should decide on a course of action:

- a. either through the Alpha Trust Discipline and Dismissal procedure or,
- b. where a pattern of behaviour moves from a concern to meeting the harm threshold, by referral to the LADO.

Information regarding low-level concerns will be retained in line with the relevant school's / Trust's retention policy.

10. Supporting Staff

All adults in schools should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

11. References

In accordance with part three of the latest version of KCSIE (particularly paragraphs 222-224), only substantiated safeguarding allegations should be referred to in references. Low-level



concerns must not be included in references, unless they relate to issues which would normally be included in a reference, for example misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.



Appendix A - Low-level Concerns Reporting Form

Low-level Concern Reporting 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 way that:

- Is inconsistent with the Alpha Trust 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.

Please provide a concise record, including brief context in which the low-level concern arose and the details in chronological order. Please be as precise and accurate as possible.

Please include any other concern(s) or details of relevant incident(s) – use a separate sheet if necessary.

This record should be signed, timed and dated.

Name of person causing concern:

Their Role:

Their normal place of employment:

Details of concern:

Signed:

Time and Date:

Please Print Name:

Received by:

Time and Date:

Action taken:

