

**Policy Title: Staff Low Level Concerns Policy**

**Mortimer**



**Leader: Mr S Hignett**

**Review Date: September 2025**

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## 1. Introduction

At Mortimer Community College, 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 Code of Conduct.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

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

The following is taken from Keeping Children Safe in Education September 2024

**431.** *As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. (Page 106-107)*

**432.** *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:*

- *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. (Page 107)*

## What is a low-level concern?

**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.

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. **(Page 107)**

**434.** Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. **(Page 107)**

**435.** Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. **(Page 107-108)**

**436.** It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings. **(Page 108)**

#### 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 the senior leadership 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 Designated Safeguarding Lead (Mr Liddle) and/or the Head Teacher (Mr Hignett) 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 Mortimer Community College, 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.

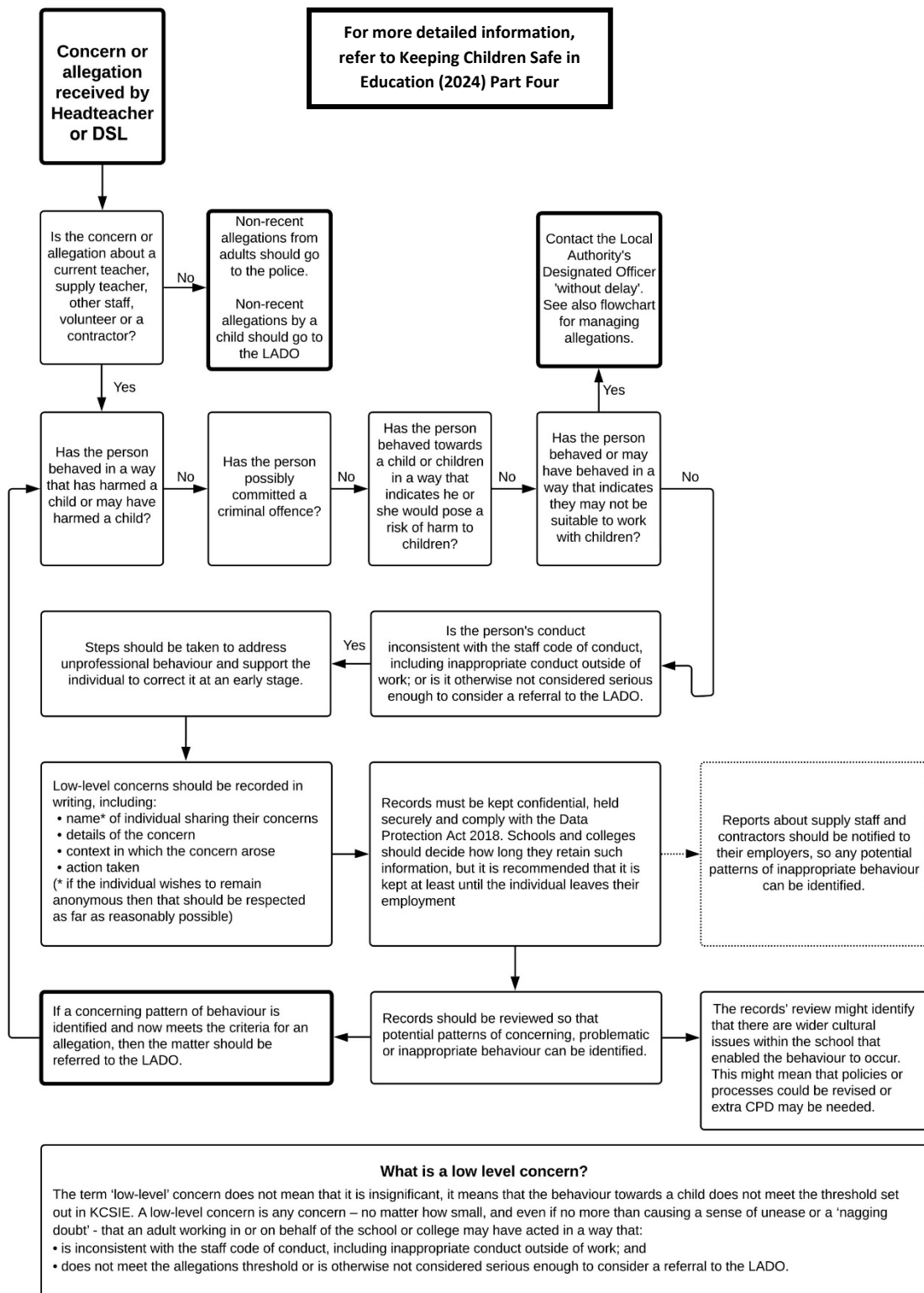
##### **Consideration will be given to:**

(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.

## 6. Process to follow when a Low-Level Concern is raised

### Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



## **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.pdf>

## **8. Low Level Concern Form**

This form will be available to staff in Appendix A below or via:

- The Office
- DSL
- Head Teacher

## Appendix A: Low Level Concern Form - MCC 2024-2025

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 Mortimer Community College 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.

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.

**Name of staff member reporting concern:**

**Department & Role:**

**Name of staff member concern is about:**

**Details of concern:**

**Signed:**

**Time & Date:**

<b>Received by:</b>	<b>At: (Time)</b>	<b>On: (Date)</b>
<b>Action Taken: (Specify)</b>		

<b>Signed:</b>	<b>Time &amp; Date:</b>
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This record will be held securely in accordance with Mortimer Community College's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Mortimer Community College 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.