

Low-Level Concerns Policy Updated September 2022

24 hour Safeguarding Helpline
For students, parents, staff, homestays and schools
0203 397 7744

Policy Statement

Low-level concerns are concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education*. This applies to all concerns (including allegations) about members of staff and homestays, which do not meet the harm threshold.

Concerns may arise through:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns

The term 'Low-Level' concern is any concern – no matter how small – that an adult working with the child 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the local authority

Examples of such 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

Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff / homestays to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Have clear policies and procedures
- Encouraging staff / homestays to share any low-level concern
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Reporting a low level concern

- Low level concerns about a member of staff / homestay should be reported to the DSP / DDSP as per the UK Study Centre Guardianship Safeguarding Policy

Responding to low-level concerns

If the concern is raised via a third party, DSP / DDSP will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The DSP / DDSP will use the information collected to categorise the type of behaviour and determine any further action, in line with the staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the local authorities for advice.
- Low level concerns will be dealt internally
- Further investigation will be undertaken if necessary

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action through our disciplinary procedures
- Retained at least until the individual leaves employment / stop hosting

References

Keeping children safe in education 2022: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf