

Low-Level Concerns Policy

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| **Policy Written on** | **Policy Written By** | **Policy approved by the Board of Directors on** | **Review Date** |
| **6th July 2022** | **Sarah Cox** | **8th July 2022** | **July 2023** |
| **01.08.23** | **Sarah Cox**  | **5th September**  | **September 2024** |
| **20.06.25** | **Reviewed by Sarah Cox**  | **9th September 2025** | **September 2027** |
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# **Introduction**

#### At the Melton Learning Hub, 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 (please see separate policy). This policy sets out the detail and processes for staff regarding low-level concerns they may have.

# **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 of Centre about their concern via email. If the Head of Centre cannot be contacted, the Chair of Directors should be contacted instead.

# **Keeping Children Safe in Education September 2025**

#### The following is taken from Keeping Children Safe in Education September 2022 but remains current

*“As part of their whole school 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.*

1. *Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) 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 concerning, problematic or inappropriate 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.*

### What is a low level concern?

1. *The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338. 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 allegations threshold or is otherwise not considered 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;*
	+ *engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,*
	+ *using inappropriate sexualised, intimidating or offensive language.*

*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.*

*It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and 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 potential allegations or misunderstandings.”*

Although this guidance is for schools as an alternative education provider the Melton Learning Hub holds itself to the highest standards of safeguarding. We therefore follow all recommended guidance.

# **Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct**

# **Self- reporting**

# At times a member of staff s conduct might slip below what the charity or they expect of themselves**.** The Melton Learning Hub encourages staff to be open and honest where this has occurred. Staff are encourage to discuss this with their line manager. A record will be kept of the circumstances and details of the incident. Where necessary we will share this with partner agencies. It is more concerning to management and the Board where staff try to hide or deny what might be classified as a one of slip of the tongue. The incident might highlight to management that we need to support that member of staff or change the dynamic of groups they are teaching.

# **Storing and use of Low-Level Concerns and follow-up information**

#### Low level concern emails and follow-up information will be stored securely within the Centres HR Safeguarding systems, with access only by the 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 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 the Melton Learning Hub, 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:

#### 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

#### if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

#### Reviewed June 2025

#### Head of Centre

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