

## Low Level Concerns Policy

### September 2023

**Date approved:** September 2023  
**Approved by:** Impact North West Schools Proprietor Board  
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## 1. Policy Statement

- 1.1 The policy outlines Impact North West School's approach to managing concerns about adults which do not meet the allegation threshold of harm nor are considered serious enough to consider a referral to LADO.
- 1.2 For the purpose of this policy, the term 'staff' will refer to any adult associated with Impact North West Schools, i.e., whether working for or with Impact North West School's, engaged as a paid employee, worker or self-employed contractor, volunteer, agency staff, governor, or director.
- 1.3 This policy does not form part of any member of staff's contract of employment, and it may be amended at any time.

## 2. Roles, Responsibilities, and Implementation

- 2.1 The directors have overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Head of Centre and Business Manager.
- 2.2 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all staff are responsible for supporting colleagues and ensuring its success. Impact North West Schools is committed to safeguarding and promoting the welfare of children and young people and expects all to share this.

## 3. Aims

- 3.1 To ensure that all concerns about adults can be identified and spoken about openly with the appropriate safeguarding team.
- 3.3 To create an open and transparent culture which enable settings to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working for or with Impact North West Schools are clear about professional boundaries and act within them, in accordance with the ethos and values of the Trust.

## 4. Definition

- 4.1 A low-level concern is 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:
  - a) is not consistent with Impact North West School's Code of Conduct; and/or

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b) 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.

4.2 Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Head of Centre and Executive Head of centre.

## 5. The Importance of Sharing Low-Level Concerns

5.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe (*Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers*). All concerns, no matter how small, must be reported.

## 6. Reporting a Low-Level Concern

6.1 In line with Impact North West School's whistleblowing Policy any concerns should be raised first with the Headteacher. In the absence of the Headteacher the concern should be raised with the Business Manager or the Deputy Designated Safeguarding Lead (DDSL). The Headteacher will inform the DSL (or Deputy DSL) and their Human Resources representative.

6.2 Concerns about the Headteacher must be reported to the Managing Director (if assessed to be a low-level concern and not meeting LADO threshold) and the Human Resources representative.

6.3 Concerns about a director must be reported to the Executive Head of Centre.

6.4 Concerns about the Executive Head of Centre must be reported to the board of directors.

6.5 If a concern is reported to the DSL, as opposed to the Head of Centre, the DSL must inform the Head of Centre at the earliest opportunity.

## 7. Self-Reporting

7.1 Occasionally, an individual might find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an individual may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. In these instances, an individual may wish to self-report, and this is encouraged. This can be positive for several reasons:

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- it enables a potentially difficult issue to be addressed at the earliest opportunity.
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and
- it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Any individual who wishes to self-report should speak with their Head of Centre.

## 8. Response to a Low-Level Concern

8.1 In the event that a low-level concern is raised, the DSL will discuss the concern with the Headteacher and the Human Resources representative. The information will be reviewed to determine whether the behaviour:

- is entirely consistent with Impact North West School's Code of Conduct and the law;
- constitutes a low-level concern;
- is serious enough to consider a referral to the LADO; or
- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation, and referred to the LADO/other relevant external agencies.

8.2 Where necessary, Impact North West School's will initially seek the advice of the local authority's safeguarding team e.g Cheshire West and Chester's SciE team or Wirral's IFD team (maintaining the anonymity of the individual where possible).

8.3 Where appropriate, either the Head of Centre or DSL will speak with the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

## 9. Outcomes

### i. The behaviour is entirely consistent with the organisation's Code of Conduct

The individual in question will be informed by the appropriate DSL what was shared about their behaviour so that they have an opportunity to respond. The individual in question will be informed that their behaviour is entirely consistent with Impact North West School's Code of Conduct.

The DSL will also speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Code of Conduct and the law.

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ii. **The current concern is low-level**

The individual in question will be informed by either the DSL or Head of Centre what was shared about their behaviour so that they have an opportunity to respond.

The DSL or Head of Centre, working with the Human Resources representative. will determine the most suitable response. This may include:

- A conversation with the individual about their behaviour and why it was deemed to be a low-level concern
- Training
- Mentoring from an appropriate individual, e.g., a line manager
- Any support as identified by the individual themselves

If the concern becomes a disciplinary matter, Impact North West School's Staff Disciplinary Policy will be followed.

iii. **The current concern is sufficiently serious enough to warrant a referral to the LADO or when considered with any other low-level concerns that have been shared about the same individual, should be reclassified as an allegation**

In the event that the current concern should be referred to the LADO or reclassified as an allegation, Impact North West School's whistleblowing Policy will be followed.

**10. Recording**

10.1 A low-level concerns record will be kept centrally by the DSL and Business Manager. This record will be accessible to the Executive Head of Centre, Head of Centre and Deputy DSL, the Human Resources representative

Holly Cottrell Executive Head of Centre  
Jayne Jones Head of Centre  
Jo Smith the Human Resources representative  
Hayley Cottrell Deputy DSL

10.2 The concerns record will be kept in a chronological order as a running record. Each entry will have the time and date recorded, along with the name of the individual who has made the record and the outcome of the concern. The records will be kept confidential and will be held securely.

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- 10.3 The records will be held centrally so that they can be easily reviewed by the Head of Centre and Deputy DSL and any potential patterns of concerning, problematic or inappropriate behaviour spotted.
- 10.4 If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO, the records relating to the low-level concern will be placed on the individual’s personnel file.
- 10.5 If a low-level concern (or group of concerns) is re-classified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the individual’s personnel file.
- 10.6 If the low-level concern is raised about an individual who works with the Human Resources representative, but is not a member of staff, e.g. Agency Staff/Contractor, then any records relating to the concern will be shared with the individual’s employer. If necessary, advice will be sought from the LADO on what can be shared and with whom.
- 10.7 The Human Resources representative, the Head of Centre and the Deputy DSL will be responsible for recording any concerns.

**11. Review period**

11.1 This policy will be reviewed annually.

In Consultation With		
Date Agreed	Name	Position
<b>Date for Review:</b>		

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