



**St Bonaventure's Catholic Primary School  
Egerton Road,  
Bishopston  
Bristol,  
BS7 8HP**

**LOW LEVEL CONCERN  
POLICY**

<b>Policy Owner</b>	Headteacher
<b>Governing Body Committee</b>	Standards
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This policy is available at:  
<http://www.st-bonaventures.bristol.sch.uk/web/policies/270975>

**Vision statement**

At St. Bonaventure's Catholic Primary school, we strive to be the best we can; guided by the light of Christ. Our children have open hearts and minds, a sense of awe and wonder and a love for each other, themselves and God.

**Intent**

This policy applies to all staff employed by St Bonaventure's Governing Body and other individuals who work or volunteer at school. It is reviewed annually to ensure compliance with current regulations and law. This policy must be read in conjunction with our Safeguarding and Child Protection Policy and the current statutory guidance Keeping Children Safe in Education, September 2022, part 4, section 2.

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviours set out in our Safeguarding and Child Protection Policy are lived, monitored, and reinforced.

**Definition of a low-level concern**

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school's Code of Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

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

- being over friendly with children;
- making unnecessary physical contact with a child;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

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 (please refer to the school's Code of Conduct), 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 from potential false allegations or misunderstandings.

## **Implementation**

### Reporting low-level concerns

Where a low-level concern has been identified, this should be reported as soon as possible to the head teacher. However, it is never too late to share a low-level concern if this has not already happened.

Where the head teacher is not available, the information should be reported to the deputy head teacher.

Low-level concerns about the Designated Safeguarding Lead and/or the head teacher should be reported to the Chair of Governors.

### Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the head teacher a record of the conversation will be made by the head teacher which will be signed, timed, and dated.

### Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The head teacher (or in their absence, the deputy head teacher) will:

- Speak to the person reporting the concern to gather all the relevant information
- Determine if there is a low-level concern or if the concern needs to be escalated
- If a low-level concern is identified, speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice may also need to be taken)

The head teacher will be the ultimate decision maker in respect of low-level concerns, although it is recognised that depending on the nature of the concern, the head teacher may wish to consult with the LADO and take a more collaborative decision-making approach.

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be

made to the LADO and HR advice taken.

Allegations procedure within the Safeguarding and Child Protection Policy and Disciplinary Policy will be followed:

- 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 or Police: a referral should be made to the LADO and HR advice taken. In this case the school's Code of Conduct within the Safeguarding and Child Protection Policy and Disciplinary Policy will be followed.

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

#### Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible.

However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

#### Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self- report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

### **Impact**

All staff have a professional responsibility to report concerns about other members of staff and/or volunteers.

#### Where behaviour is consistent with the Staff Code of Conduct

Feedback will be given to both parties to explain why the behaviour was consistent with the Code of Conduct.

#### References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

### **Monitoring**

#### Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is

added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

#### What is the role of the Governors?

The head teacher will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

#### **Links with other policies**

This assessment policy is linked to our:

- Safeguarding and Child Protection policy
- Code of Conduct
- Keeping Children Safe in Education, September 2022.





