


MERTON COURT SCHOOL



Low Level Concerns Policy

To be reviewed September 2025 by: DSL, Headmaster
Signed by the Headmaster/Proprietor: 
Shared with staff: 25/09/24
Put on the Website: 25/09/24

This policy applies to the whole school inclusive of the Early Years Foundation Stage (EYFS)

This policy should be read in conjunction with the following:

Merton Court Safeguarding and Child Protection Policy

Keeping Children Safe in Education (Sept 2024)

Staff Code of Conduct/Behaviour Policy

Availability:

This policy is made available to parents and staff in the following ways, via the staff shared drive and on request a copy may be obtained from the School Office.

Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Headmaster/Proprietor to judge its effectiveness and will be updated in accordance with Government changes.
- The Headmaster/Proprietor will undertake a formal annual review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require. If changes are required, the school will implement them.

this has not already happened. Where the DSL is not available, the information will be reported to the deputy designated safeguarding lead/Headmaster.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Headmaster and those about the Headmaster/Proprietor will be reported to the Chair of the Advisory Board who will be reported directly to the LADO (without informing the Headmaster/Proprietor).

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the headmaster of the details as soon as possible.

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. This file is kept by the DSL and is in a locked cupboard.

Where concerns are reported verbally to the headmaster/DSL a record of the conversation will be made by the headmaster 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 headmaster/DSL will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police. 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 school's Staff Behaviour and 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.

- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO.

Clarity around allegations:

Appropriate:

- Behaviour which is entirely consistent with our School's Staff Code of Conduct/Behaviour Policy

Any adult linked to our School who has behaved in a way that:

- Is inconsistent with the Staff Code of Conduct/Behaviour Policy, including in appropriate conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about their suitability to work with children
- Does not meet the harms threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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.

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Aims

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 behaviour 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 Staff Code of Conduct/Behaviour Policy and
- does not meet the harms 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;
- having favourites;
- taking photographs of children on their personal 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 (please refer to the school's Staff Code of Conduct/Behaviour Policy), 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 the school, from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the DSL. However, it is never too late to share a low-level concern if

this has not already happened. Where the DSL is not available, the information will be reported to the deputy designated safeguarding lead/Headmaster.

Low-level concerns about the Designated Safeguarding Lead will be reported to the Headmaster and those about the Headmaster/Proprietor will be reported to the Chair of the Advisory Board who will be reported directly to the LADO (without informing the Headmaster/Proprietor).

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the headmaster of the details as soon as possible.

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. This file is kept by the DSL and is in a locked cupboard.

Where concerns are reported verbally to the headmaster/DSL a record of the conversation will be made by the headmaster 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 headmaster/DSL will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police. 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 school's Staff Behaviour and 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.

- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO.

- Reports about Supply staff or contractors will be notified to their employers so that any potential patterns of inappropriate behaviours can be identified.

Allegations procedure within the Safeguarding Policy and Staff Code of Conduct 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.

In this case the school's Staff Code of Conduct within the Safeguarding and Child Protection 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.

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/ Behaviour Policy. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. Where behaviour is consistent with the Staff Code of Conduct/ Behaviour Feedback will be given to both parties.

The Low-Level Concerns file.

These records will be reviewed termly, 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. 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.

Clarity around allegations:

Appropriate:

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