

## Low-Level Concerns Made Against Staff & Host Families

A low-level concern is any concern that an adult has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. It doesn't meet the threshold of harm and is not considered serious enough to be referred to the local authority. However, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', it should be recorded.

Low-level concerns are part of a spectrum of behaviour. This includes inadvertent or thoughtless behaviour, behaviour that might be considered inappropriate depending on the circumstances or behaviour which is intended to enable abuse.

Examples of such behaviour could include:

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- being over friendly with children
- having favourites
- adults 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.

This statement is made in accordance with paragraphs 407 to 412 of Keeping Children Safe in Education 2021.

All low-level concerns should be reported to, then recorded in writing by, the DSL (Candy Edwards), the Deputy DSL (Sunny Field) or the other Director (Larry Field). This must include details of the concern, the context in which it arose, how it was followed up and resolved. A note of any actions taken and decisions reached must also be made.

- This record will be kept by OPDS and will be placed on the appropriate, confidential personnel file.
- A copy of the form should be provided to the person about whom the concern was raised.
- If this person refuses to sign the completed form within 5 working days, (one calendar week ideally), this should be noted on the form.

The purpose of this is to enable records to be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the Local Authority Designated Office (LADO), using their preferred method of reporting. This record will be retained at least until the individual leaves their employment.

Any records which contain information about allegations of sexual abuse will be made available to the Independent Inquiry into Child Sexual Abuse (IICSA), social services or the police should they be required. These records will be retained at least until the accused has

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reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Allegations will be dealt with in accordance with Part 4 Section 2 of Keeping Children Safe in Education and referred to the local Safeguarding Partnership.

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**HIGHLY CONFIDENTIAL**

**Record of low-level concern**

<b>Name of employee/ host family/ adult</b>	
<b>Position held</b>	
<b>Name of person completing this form</b>	
<b>Position held</b>	


**Summary of low-level concern(s):  
(Including date(s) and contextual information)**

**Initial action taken and decisions reached:**

**How low-level concern was followed up and by whom:  
(Including date(s) and those in attendance when any consultations / meetings were held)**

**Outcome of investigation:  
(Including rationale)**



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If applicable, outcome of any formal disciplinary hearing (including date of outcome letter sent to employee/host family/other):

If applicable, outcome of any formal appeal hearing (including date of outcome letter sent to employee/ host family/other):

For low-level concerns, if the concern(s) relate to misconduct or poor performance, is the individual aware this information will be referred to in any future reference? Yes / No (NB references must be factual and not contain opinion)

Employee / Host family / Other - Comments:

Signed / Dated:

DSL / Deputy DSL / OPDS Director

Signature \_\_\_\_\_ Date \_\_\_\_\_

Employee/Host/Other :

Signature \_\_\_\_\_ Date \_\_\_\_\_