

# Our Lady's Catholic College

## Low Level Concern Policy



Keeping Children Safe in Education is clear that 'schools and colleges need to report and record all concerns and allegations against adults, including low-level concerns.' KCSIE states that it is vital that there is a whole-school approach to safeguarding and everyone works to create a safe culture within the organisation. This means all concerns and allegations against adults working in the establishment, including school staff, supply teachers, volunteers, and contractors, are dealt with promptly and effectively.

At OLCC all allegations against staff are recorded and dealt with appropriately. Giving us an open culture where concerning and problematic behaviour is identified early, minimising the risk of abuse. Giving the message that OLCC takes our responsibility of safeguarding the students within our care seriously and that we practice safer recruitment ensuring all our staff are appropriate to work with children and young people.

If implemented well, this should encourage an open and transparent culture; enable organisations to identify concerning behaviour early; minimise the risk of abuse; and ensure that adults working with children are clear about professional boundaries and act within them, in accordance with the ethos and values of the organisation.

### How do we report low level concerns at OLCC?

Email Mrs Seddon (mark it confidential), the subject content must say 'Low Level Concern', never put a concern about an adult on CPOMS.

**This must be followed up by the member of staff reporting**



## Key facts

### **What are Low-Level Concerns?**

A low-level concern is any concern that an adult working in a position of trust has acted in a way that is inappropriate, including inappropriate conduct outside of work. It is any concern that an adult may have acted in a way that:

- Is inconsistent with the staff code of conduct;
- Does not meet the allegations threshold to refer to the Local Authority Designated Officer (LADO)

Creating a culture in which all concerns about adults are shared responsibly, with the right person, recorded and dealt with appropriately, is critical.

### **Why low level concerns need to be reported?**

These small concerns often act as puzzle pieces that lead to a bigger picture of the events occurring within your organisation. Therefore, it is critical that all concerns are recorded to prevent the future harm and exploitation of the students within your care. Dealing with these concerns effectively also protects those working in your organisation from potential false allegations or misunderstandings.

Ensuring that all staff and volunteers who work with children are suitable to do so is one of the most important aspects of an organisation's safeguarding duties. The early identification and appropriate management of safeguarding concerns about adults is an essential part of this. Where a concern reaches the threshold of an allegation, clear guidance exists on how organisations should report, record and handle that allegation. Recently, there has been increased guidance and support on how to manage 'low-level concerns' that fall below the threshold of an allegation.

### **Types of behaviours**

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, contrary to the [organisation's] policy
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door
- humiliating children.

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

#### **Concern or allegation that may meet harm threshold**

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; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

#### **Low-level concern**

Does not mean that it is insignificant. 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 with children may have acted in a way that:

- Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the harm threshold, or is otherwise not serious enough to make a referral to the LADO.

#### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation's code of conduct and the law.

**Risk Minimisation:**

Organisations have a duty of care to minimise the risk to children from those in a position of trust. This can include:

- Reducing the opportunity and acceptability of inappropriate behaviours;
- Increasing the opportunity for the detection and sharing of low-level concerns;
- Ensuring there are robust and effective staff support systems in place;
- Creating a robust, holistic safeguarding culture that everyone signs up to.

**What to do if you have a concern?**

Low-level concerns should be reported to the lead in your school. Consultation with the LADO can also be considered. Records should include:

- The details of the concern;
- How the concern arose; and,
- The actions taken. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the agency should decide on a course of action. It is important staff are encouraged to share low level concerns and feel confident to self-refer if required.

**How does our safeguarding culture keep children safe:**

- Policies and processes in place to deal with concerns;
- A system to record and track low-level concerns;
- Insight that low-level concerns may arise in several ways and from several sources such as complaints made by parents or disclosures made, other staff;
- A transparent culture where all concerns about adults are shared, recorded and dealt with appropriately;
- To ensure that adults working in the organisation are clear about professional boundaries

**Further Information:**

- [LADO Allegations – Lancashire Safeguarding Children Partnership](#) [LADO.Admin@lancashire.gov.uk](mailto:LADO.Admin@lancashire.gov.uk)  
01772 536 694
- [Responding to low-level concerns in education | NSPCC Learning](#)
- [low-level-concerns-guidance-2021.pdf \(farrer.co.uk\)](#)
- [Preventing abuse in positions of trust | NSPCC Learning](#)

## Case study

William Vahey qualified as a teacher in 1972 and over the next 42 years would be employed by 10 different international schools, none of whom picked up on a 1969 sex offences conviction when he was working as a teacher's aid in California.

Vahey hid in plain sight, using his role as a teacher to abuse hundreds of children. Several issues relating to Vahey's general behaviour within the school came to light following his arrest. These behaviours included:

- altering accommodation arrangements of the pupils on trips
- insisting on having keys to the pupils' rooms
- giving out chocolates and sweets in class
- making comments to pupils of a sexual nature 'they deserved it'
- telling jokes with explicit sexual connotations which made staff feel uncomfortable
- insisting that he care for sick pupils at night
- giving an inappropriate and graphic sex education class to pupils at the school
- undermining other staff and being disrespectful to junior staff

Many of these low-level concerns were noticed by staff but seen as isolated events and only reported once Vahey's abuse became public knowledge. Several former colleagues came forwards to share how controlling, ill-tempered, and suspicious Vahey was. Unfortunately, they did not know how to proceed further regarding these concerns, largely due to his wife's powerful status as the head of the European Council for International Schools.

Had these low-level concerns been reported there could have been earlier opportunities to prevent the abuse of Vahey's victims.

## Key questions

How could professional curiosity of prevented this? Why was it allowed to happen? Why didn't staff report anything? How could this have been stopped?

How can practitioners be professionally curious? Here are some considerations when seeking to be professionally curious:

- As practitioners, you should not presume to know what is happening in a situation and should ask questions and seek clarity if you are not certain.
- Don't be afraid to ask questions, and do so in an open way, so they know that you are asking to ensure that children are safe, not to judge or criticise.
- Look to use the [Rethink Formulation Model](#) as a framework for asking questions and exploring the issues you are curious about.
- Think about using tools to understand the daily lived experience of the child such as [A Day in the Life](#) (adapted from the work of Jan Horwath).
- Be open to the unexpected, and incorporate information that does not support your initial assumptions into your assessment of what life is like for an individual.
- Seek clarity, either from the family or other professionals.
- Be open to having your own assumptions, views and interpretations challenged, and be open to challenging others
- Consider what you see as well as what you're told. Are there any visual clues as to what life is like, or which don't correlate with the information you already hold?

