



## ALTERNATIVE PROVISION

# Low-Level Concerns Policy

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Approved by: [RAISE-AP Educational Directors](#)

Approval Signatures

*RAISE-AP  
Directors*

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## Introduction

Organisational culture sets the context and expectations of all behaviour in an organisation, and a positive culture where concerns can be identified and spoken about openly is a key element of a strong safeguarding system.

What that means in practice is that ensuring that all those who work with children behave appropriately, and the early identification and prompt and appropriate reporting and management of concerns about adults, is critical to effective safeguarding.

Low-Level Concerns are described in KCSIE – Section Two: Concerns that do not meet the harm threshold.

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## Purpose

It is important to recognise that, in practice, the words ‘allegation’ and ‘concern’ can be used interchangeably.

Sometimes individuals may shy away from the word ‘allegation’ and express it as a ‘concern’ instead.

The crucial point is that whatever the language used, the behaviour referred to may:

- a) Be capable of meeting the harm threshold (and hence be referable)
- b) Does not meet the harm threshold (in which case it should be treated as a low-level concern)

The focus should not be on the language used by the person disclosing it; the focus should, instead, be on the behaviour being described and the context.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviours of all [RAISE-AP](#) staff are constantly adhered to.

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# Concerns that Do Not Meet Threshold

## Low-Level Concerns

As part of the [RAISE-AP](#) approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working with children are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with in accordance with the following policies – Whistleblowing, code of conduct and safeguarding policy, is critical.

If implemented correctly, this should encourage an open and transparent culture, enabling staff to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working at [RAISE-AP](#) are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the provision.

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold for a LADO referral:

- 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 he or she 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.

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 in or on behalf of [RAISE-AP](#) may have acted in a way that:

- is inconsistent with the Employee Handbook, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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;
- 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, 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 [RAISE-AP](#) from potential false allegations or misunderstandings.

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## Response

If the concern has been raised via a third party, the DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.
- to the individual involved and any witnesses.

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken.

The DSL should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s).

This information should be given to the DSL to record on CPOMS under the Low-Level Concern category for the student involved.

Where there is a pattern of concerns being raised around the same member of staff this must be taken into account and acted upon immediately. This must be explored with the Head of Provision and [RAISE-AP](#) educational directors to determine if there is a pattern of concern that warrants a referral to LADO or that the matter/s are to be dealt with by internal processes.

Where it is felt the threshold of an allegation is met, in line with [RAISE-AP](#) Safeguarding Policy, any allegation against people who work with children should be reported immediately to the DSL.

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## Raise Values

Our [RAISE-AP values](#) (Resolve, Attitude, Invest, Social Skills and Education) are key in everything we do, specifically with attitudes (modelling and expectations), invest (tailoring setup for our young people) social skills (becoming part of a community) which are linked to our Low-Level Concerns policy.

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