

## DDSCP Briefing Note: Low Level Concerns about Staff

As part of the whole school approach to safeguarding, [Keeping Children Safe in Education](#) (KCSIE) stresses that schools and colleges should ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

A positive culture in which concerns can be identified and spoken about openly is a key element of a strong safeguarding system.

*Agencies providing services to children [...] should ensure that a culture of openness and trust is fostered within the organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner<sup>1</sup>*

Creating and encouraging an open and transparent culture will enable schools and colleges to

- Identify concerning, problematic or inappropriate behaviour early
- Minimise the risk of abuse
- Ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

For some time, establishments have had policies and procedures for allegations that may meet the harm threshold which is consistent with local guidance<sup>2</sup>. KCSIE has now also specified that schools and colleges should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold, known as low level concerns.

### Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant. It 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 the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct

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<sup>1</sup> Developing and implementing a low-level concerns policy: A guide for organisations which work with children (2021) Farrer & Co, page 4

<sup>2</sup> DDSCP [Allegations Against Staff, Carers and Volunteers](#) procedure

- outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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.

### **Actions for Education Providers**

Keeping Children Safe in Education, part 4, section 2 outlines the actions which Governing Bodies and Proprietors should take, including as good practice setting out their low-level concerns policy within their staff code of conduct and safeguarding policies, ensuring that low-level concerns are dealt with and recorded appropriately.

### **Helpful Guidance and Resources to Support Education Providers**

- For detailed guidance, including how to design and implement a low level concerns policy in a positive and effective way, see [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#), Farrer and Co (2021)
- A helpful reference point for identifying low level concerns and informing school/college staff of the expectations as reflected in the staff code of conduct see [Guidance for safer working practice for those working with children and young people in education settings](#), Safer Recruitment Consortium (2019). There is also a [Covid Addendum](#) (2020) to help establishments apply safe systems of work during the pandemic. Please note the guidance is currently being updated to reflect KCSIE 2021, particularly low level concerns reporting, and to incorporate the Covid addendum in the main body.
- The NSPCC has also developed a [webpage](#) about responding to low-level concerns about adults working in education. This includes example behaviour codes for staff and volunteers.