




The Aylesbury Vale Academy

RESPECT | ASPIRATION | RESILIENCE

Low Level Concerns Policy

Policy Reference:	AVA.164
Description:	This document provides a framework to ensure all students remain safe within both the primary and secondary phases and that the Academy Trust works effectively with external agencies to protect students.
Status:	
Policy Audience:	Staff and parents/carers
Academy Contact:	Academy Principal
Other related AVA policies and procedures:	Health and Safety Policy, SEN Policy, Whistleblowing Policy, Allegations of Abuse Against Staff Policy, Annual Safeguarding Report, Equality Policy, Designated Teacher for Looked After Students
Governor Committee:	Full Governing Body
Approved by the Governing Board on:	22.1.2025
Latest Date for Next Review:	22.1.2026
Version + Schedule of Amendments:	V1
Signed:	
Date of Signature:	22.1.2025

In reviewing this policy, the Governing Board has had regard to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged by this policy.

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1. Context

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in our Child Protection Policy.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a pupil, parent or other adult within or outside the Academy
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

2. Definition of Low-Level Concerns:

The term 'Low-Level' concern is any concern – no matter how small – that an adult working in or on behalf of the Academy may have acted in a way that:

- Is inconsistent with the staff code of conduct, 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 designated officer at the local authority (LADO)

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children/families
- Having favourites
- Taking photographs of children on their mobile phone (this could include in a social manner)
- 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

3. Sharing Low-Level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Have clear policies and procedures
- Empowering staff to share any low-level concerns as per our reporting system
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Academy's safeguarding system

4. Reporting a low level concern:

- Low level concerns about a member of staff should be reported to the Academy Principal/Primary Headteacher as per the Academy's Child Protection procedures.
- If the concern is about the Academy Principal this should be reported to the Chair of Governors at cog@theacademy.me
- Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

Staff should email their concern to one of the Designated Safeguarding Leads (safeguarding@theacademy.me), the Academy Principal, or the Primary Headteacher. ~~use the Academy's Low-Level Concerns Reporting Form.~~

5. Responding to low-level concerns

If the concern is raised via a third party, the Academy Principal/Primary Headteacher will collect evidence where necessary by speaking:

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

The Principal/Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Academy's staff Code of Conduct

- Allegations that meet the harm threshold will be referred to the LADO for advice
- Low level concerns that the Academy feel may need further guidance on will be referred to the LADO for advice
- Low level concerns that the Academy feel they can deal with internally will be dealt with via the Academy's usual child protection investigation process
- The Academy will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes

6. Record keeping

All low-level concerns will be recorded in writing and recorded on the Low Level Concern Log . In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the GDPR policy
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified
- Where a pattern of such behaviour is identified, the Academy will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, the Academy will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the Academy
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified

7. Reviewing a low level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Academy Principal/Primary Headteacher will decide on a course of action, which may include:

- ~~Disciplinary investigation and/or proceedings~~
- Management Advice, including recommendations for training

- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold)
- Disciplinary investigation and/or proceedings

If the concern relates to volunteers, or any other concerns arise, Academy can contact the LADO for further advice.

8. References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

9. Links with other policies

- Staff Code of Conduct and Discipline Policy
- Child Protection Policy
- E-Safety Policy
- Health and Safety Policy
- SEN Policy
- Whistleblowing Policy Mangling Allegations Against Staff Policy
- Annual Safeguarding Report
- Equalities Policy and Objectives