



Low Levels Concern Policy

At Over the Wall, we aim to create an open and transparent culture where all concerns about all adults involved with our camps are dealt with promptly and appropriately. We aim to identify any concerning, problematic, or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of our charity (including staff, volunteers, and board members) are clear about professional boundaries and act within these boundaries, following our ethos. This policy should be read alongside our Safeguarding Policy.

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1. Introduction

Over the Wall is committed to the welfare and protection of children and young people. We recognise that even low-level concerns can have significant implications for the safety and well-being of children. This policy outlines our approach to identifying, reporting, and addressing low-level concerns regarding the welfare of children and young people within our organisation.

2. Scope

This policy sets out a framework whereby staff and volunteers are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, or other person working in the charity. Its purpose is to help create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour set out in our Safeguarding policy are lived, monitored, and reinforced.

3. Definition of a low-level concern

Low-Level Concerns: Refers to situations where there is a suspicion, worry, or doubt about the welfare or safety of a child, but there is no immediate risk of harm. These concerns may arise from observations, disclosures, or behaviour patterns.

The following is taken from Keeping Children Safe in Education 2023 and identifies what may be considered behaviour relating to low-level concern:

What is a low-level concern (LLC)?

The term '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 in or on behalf of the organisation may have acted in a way that:

- is inconsistent with the code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).
- Inadvertent or thoughtless behaviour
- Behaviour that might be considered inappropriate depending on the circumstances.

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 phones, contrary to OTW's policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- 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.

Low-level concerns may arise in several ways and from several sources, such as suspicion, complaint, or disclosure made by a child, parent, or other adult within or outside of the organisation or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person, recorded, and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the organisation from becoming the subject of potential false low-level concerns or misunderstandings (Department of Education 2023)

Spectrum of behaviour

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
- behaved 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

This 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 merit a referral to the LADO

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s staff code of conduct, and the law

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 may have acted in a way that.

Procedure for Reporting a Low-Level Concern

Any low-level concern must be shared with the Designated Safeguarding Officer (DSO) without delay and within 12 hours of the incident or becoming aware of it. If this is during residential camp, it should be reported to the identified safeguarding lead for that camp or the Independent Safeguarding Advisor, who will decide if any immediate action is required and then be responsible for escalating to the DSO for further actions and recording on the low-level concerns database. In the absence of the DSO, it should be escalated to OTW’s CEO.

Where the concern relates to the DSO, it must be raised with OTW’s CEO.

If a low-level concern is not shared within 12 hours, the delay should never be seen as a barrier to raising it with the DSO.

Concerns can be reported verbally or in writing. It is essential to document the concern as soon as possible if reported verbally. Any Low-Level Concerns should be documented on the low-level concern form (Appendix 1).

The DSO will assess the concern and determine the appropriate action. This may include further investigation or consultation with relevant agencies.

Self Reporting

It may be that a person finds themselves in a situation that could be misinterpreted or appear compromising to others; or they may have behaved in a manner that, on reflection, they consider falls below the standard set out in the Code of Conduct. In these circumstances, they should self-report. This will enable a potentially difficult situation to be addressed early if necessary.

Records of Low-Level Concerns

Over The Wall will retain all records of low-level concerns (including those subsequently deemed by the DSO to relate to behaviour entirely consistent with OTW’s Code of Conduct) in a central electronic file. The records will be kept confidential and held securely, and access will be restricted to relevant staff members.

Records will contain referrals made to the LADO or equivalent professional.

These will be kept chronologically where multiple low-level concerns have been shared regarding the same individual.

Low-level concerns will not be stored on personnel files unless further action is required, and they need to be highlighted.

In line with best practice, keeping low-level concerns separately will allow Over the Wall to spot potential behaviour patterns while reassuring staff and volunteers to share their concerns.

The information on the personnel file will be retained to allow Over the Wall to hold a clear and comprehensive summary of all allegations (except those which are found to have been malicious),

details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached. A copy will be provided to the individual.

Review

The DSO will periodically review the central low-level concerns folder to ensure that all such concerns are being dealt with and that any potential patterns of concerning, problematic, or inappropriate behaviour are identified and addressed. The DSO will create a record of these reviews, which will be stored alongside the folder, along with any subsequent actions taken. The Safeguarding Trustee and Board will receive relevant data relating to Low-Level Concerns.

References

Department of Education, 2023 *Keeping Children Safe in Education*. Available [here](#) (Accessed March 2024)

Farrer & Co, 2023 *Developing and implementing a low-level concerns policy: a guide for organisations which work with children*. Available [here](#) (Accessed March 2024)

Sally McCluskie
Clinical Director and Designated Safeguarding Officer
March 2024

Appendix 1

Low-Level Concerns Reporting Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Over the Walls code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to merit a referral to the LADO.

You should provide a concise record (online/electronically or hard copy)—including the brief context in which the low-level concern arose and chronological details and as precise and accurate as possible—of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed, and dated.

Your Details	
Name	
Role	
Date and time completing this form.	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	
Role	
Relationship to the individual reporting	
Details of concern	
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our code of conduct?</p>	

Details of any children or young people involved	
Name(s)	
Next steps	
Please state any other information that you feel is relevant to the processing of this concern.	
Signature	
For use by OTW designated safeguarding lead upon receipt of the concern	
Date and time concern received.	
Signature	
Role	
Actions to be taken and follow-up.	