2025-2026

Hampstead Fine Arts

Low Level Concerns Policy

The safety and wellbeing of children in our college is dependent on the vigilance of all our staff and their prompt communication to the DSL or another member of the safeguarding team of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The college is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the college setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct including Acceptable Use Policy'. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

The college does not permit the use of personal mobile phones and cameras by staff where children are present.

Our low-level concern policy

The overarching aim of the college's Low-Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the College's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

Low-Level Concerns about self (self-reporting)

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the college sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Low-Level Concerns about an adult

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met.

Any such concerns can be dealt with as a Low-Level Concern.

What should I do if I have one?

Where a low-level concern exists, it should be reported to the DSL/Head/Principal as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it.

The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision-making approach.

Concerns should be raised in line with the staff code of conduct and follow the normal lines of reporting. Concerns regarding the DSL should be reported to the Head/Principal. Concerns

regarding the Head/Principal should be referred to the DSL/Safeguarding Governor. Concern regarding the Safeguarding Governor should be reported to the Head/Principal.

How will my low-level concern be handled?

The DSL will discuss all low-level concerns s/he receives with the Head/Principal as soon as possible and in any event within 24 hours of becoming aware of it. The Head/Principal will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure outlined in the safeguarding policy.

The circumstances in which a low-level concern might be reclassified as an allegation are where:
a) the threshold is met for an allegation
b) there is a pattern of low-level concerns which collectively amount to an allegation or
c) there is other information which when taken into account leads to an allegation.

Where the Head/Principal is in any doubt whatsoever, advice will be sought from the Designated Officer (LADO), if necessary, on a no-names basis.

Having established that the concern is low-level, the DSL or Head/Principal as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:
a) the concern (or group of concerns) has been reclassified as an allegation as above; or
b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.

August 2025
Reviewed by: JC