



JLMS Management Ltd (Active For All)

Low Level Concern Policy:

Version 1 – December 2022

Review date – April 2023

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This policy should be read in conjunction with the following JLMS Management policies:

- Safeguarding and Prevent Policy
- Behaviour Code of Conduct Policy

What is a “Low-Level” Concern?

(Definition taken from KCSIE 2022)

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 JLMS Management (Active For All) 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

(If the harm threshold is deemed to have been met, then the process outlined in JLMS Management’s Safeguarding and Prevent Policy must be followed, along with potential 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, contrary to school 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 a number of sources. For example: 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



and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working for or on behalf of JLMS Management Ltd (Active For All) from becoming the subject of potential false low-level concerns or misunderstandings

This can be achieved by:

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- ensuring all staff are clear about what appropriate behaviour is, and that they are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic, or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in JLMS Management safeguarding system.

Recording low-level concerns

All low-level concerns are to be recorded in writing.

The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

This information will be reviewed and retained by the Designated Safeguarding Lead and recorded on the Safeguarding Log.

The DSL will collect as much evidence as possible by speaking directly to the person who has raised the concern (unless raised anonymously), to the individual involved, and any witnesses. This information will determine what further action may need to be taken.

This will be recorded in writing along with the rationale for the decisions and actions taken.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.



If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, then a consultation with the LADO should take place.

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JLMS Management Ltd (Active For All) strive to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards

Retaining Records

Records will be kept confidential and held securely. They will also be reviewed so that any potential patterns of inappropriate behaviour can be identified.

Records will be retained for a minimum of 5 years after the individual has left employment

This policy will be reviewed annually on the date given at the start of this document

Signed: James Welsh

Date: 31st January 2023

Name: James Welsh

Position: Managing Director, JLMS Management Ltd