

LOW-LEVEL CONCERNS POLICY: Music Masters

1. Introduction

This Policy ensures the organisation's compliance with Part 4 of Keeping Children Safe in Education (2023) which states that:

424. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Although Music Masters is not a formal education or statutory body, it is important that our processes and procedures are rigorous enough to meet the demands of our partner schools, so that we may ensure the safety and wellbeing of all children, which is paramount. This applies to all concerns (including allegations) about members of staff, including office staff, teachers, deputising or cover teachers, trustees, volunteers, and contractors, which do not meet the harm threshold.

Concerns may arise in the following ways, for example, (but are not limited to these):

- Suspicion
- Complaint
- Disclosure made by a child, parent, or other adult within or outside the school
- 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.

This policy should be read in conjunction with Keeping Children Safe in Education (2025) and other Music Masters safeguarding policies and procedures.

Music Masters and the school/s involved in any concern will work together collaboratively to ensure that all processes and procedures followed meet the needs of both the organisation and the school/s.

Music Masters will review this policy annually as part of our safeguarding review to ensure it meets current legislation and guidance.

2. Definition of Low-Level Concerns

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 school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; but
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being overly friendly with children
- Having favourites

- Taking photographs or videos of children on their personal mobile phone for no clear reason or without permissions that would be in place for example as part of a Music Masters event
- 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
- Using unnecessary or inappropriate amounts of physical touch in the performance of duties and services (eg. in instrumental tuition)

Incidents which fall short of the threshold could include an accusation that is made second or third hand and the facts are not clear, or the member of staff alleged to have done this was not there at the time.

3. The Difference between an Allegation and Concern

It is important to be clear whether an incident constitutes an 'allegation'. An allegation is where the alleged incident is sufficiently serious as to suggest that one or more children has or may have been harmed, or that the alleged behaviour indicates the individual may pose a risk of harm to children (or otherwise meets the criteria above).

If it is difficult to determine the level of risk associated with an incident the following should be considered:

- Was the incident a disproportionate or inappropriate response in the context of a challenging situation?
- Where the incident involved an inappropriate response to challenging behaviour, had the member of staff had training in managing this?
- Does the member of staff understand that their behaviour was inappropriate and express a wish to behave differently in the future? For example, are they willing to undergo training?
- Does the child or family want to report the incident to the police, or would they prefer the matter to be dealt with by the employer?
- Have similar allegations been made against the employee – is there a pattern developing?

Keeping Children Safe in Education, provides that 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 and thus should be treated as an allegation, the Local Authority Designated Officer (LADO) should be consulted in line with our general Safeguarding and Child Protection Policy.

As good practice, Music Masters and/or the school involved may wish to include the LADO in discussions as to whether the issue should be dealt with as an allegation of harm or a concern. If the decision is reached that the concern falls short of the harm threshold, there may still be a role for the LADO to provide advice and support to the employer. Such a consultation process may allow for concerns to be evaluated objectively and to ascertain whether similar concerns may have been raised by a previous employer but not met the threshold for investigation. Whilst the LADO will only record the details of those allegations which appear to meet the threshold for consideration set out above, Music Masters and/or the School will record the details of any low-level concern that arises in respect of a member of their staff.

Where it is decided that the incident does not meet the threshold of harm/risk of harm and is a concern only, then the school will take steps to ensure any conduct or behaviour issues are addressed

with the member of staff through normal employment practices. Music Masters and/or the school should take into account Teaching Standards: Guidance for school leaders, school staff and governing bodies (Updated 2021) [Teachers' Standards guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/85421/teaching-standards-guidance-for-school-leaders.pdf) when considering personal and professional conduct, and in line with Music Masters Staff and Teacher Handbooks.

4. 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.
- Having clear policies and procedures.
- Empowering staff to share any low-level concerns with the DSLs of both Music Masters and/or the school involved
- 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 school's safeguarding system.

5. Reporting a low-level concern

- Low-level concerns about a member of staff should be reported to the DSL/DDSL: as per the Safeguarding and Child Protection Policy using the Safeguarding Concern and Incident Report Template.
- If the concern is about a member of staff involved in this process, refer to the relevant section of the policy regarding reporting concerns about colleagues.
- Low-level concerns about deputising and cover staff, contractors and other visiting staff will also be reported to their employers, as appropriate or if relevant.

6. Responding to low-level concerns

The DSL and/or CEO/Headteacher at Music Masters and/or the school will be the ultimate decision-makers in respect of all low-level concerns, although it is recognised that depending on the nature of the concern, the headteacher/principal may wish to delegate and/or consult with the Designated Safeguarding Lead (DSL) or senior leadership teams to take a more collaborative decision-making approach. If concerns relate to any member of staff usually involved in decision making, then refer to the relevant section of Music Masters Safeguarding and Child Protection Policy regarding reporting concerns about colleagues.

If the concern is raised via a third party, the member of staff delegated to lead the decision-making process 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 member of staff leading this process will use the information collected to categorise the type of behaviour and determine any further action, in line with all policies, procedures and information laid out in the Staff or Teacher Handbook, or any other agreed policy in place. The person responsible will also ensure:

- Allegations that meet the harm threshold will be referred to the LADO for advice
- Low-level concerns that Music Masters and/or the school feel may need further guidance on will be referred to the LADO for advice
- Low-level concerns that Music Masters and/or the school feel they can deal with internally will be dealt with via Music Masters and/or the school's behaviour policy/code of conduct.
- Music Masters and/or the school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

7. Record keeping

All low-level concerns will be recorded in writing using Music Masters' and/or the school's appropriate reporting procedures, as laid out in Music Masters Safeguarding and Child Protection Policy. 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 DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the person leading the decision-making process will decide on a course of action, either through disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, a referral will be made
- Retained at least until the individual leaves employment at Music Masters

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.

8. 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 person leading the decision-making process 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).

If the concern relates to volunteers, or any other concerns arise, school or Music Masters staff can contact the LADO for further advice.

9. 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