

LOW-LEVEL CONCERNS ABOUT ADULT BEHAVIOUR TOWARDS CHILDREN

Background: A low-level concern is any concern about an adult's behaviour towards a child that does not meet the threshold for referral to the JDO (Jersey Designated Officer). It is any concern, no matter how small, that an adult may have acted in a manner which is not consistent with an organisation's code of conduct or relates to conduct outside of work which has caused a 'sense of unease' about that adult's suitability to work with children. Early identification and prompt management of concerns about the behaviour of adults who work or volunteer with children is critical to effective safeguarding.

Why it matters: Research into cases of child sexual abuse (CSA) has shown that grooming behaviour had been observed and concerns about 'questionable behaviour' had been raised previously by others prior to the abuse being perpetrated. Low level concerns were often not shared or not recorded or evaluated. A positive culture where concerns can be identified and spoken about openly is a key element of a strong safeguarding system
(Developing and implementing a low-level concerns policy: A guide for organisations which work with children, Farrer & Co, Erooga, Fudakowski, Davies, 2020).

Questions to consider:

Does your organisation have a culture of openness and trust where staff can share any concerns about the conduct of colleagues? Are staff assured that any concerns will be received and dealt with in a sensitive and strictly confidential manner? Do staff understand the dynamics of organisational abuse (including grooming)? Is your code of conduct a lived document which is seen to apply to all levels of the organisation? Are all staff familiar with the SPB's Managing Allegations Framework?

What to do: Ensure there is a robust code of conduct with commitment from leadership to adhere to and enforce the code and to address any attempt to bypass policies or procedures regardless of that person's status. Ensure staff know specific behaviours to be aware of and are empowered to share any concerns about inappropriate behaviour. Higher level concerns and/or allegations should be dealt with in accordance with the SPB's Managing Allegations Framework. ([Policies & Strategies | Jersey Safeguarding Partnership Board](#))



Grooming behaviours which may not be well understood by staff include erosion of boundaries, slow progression to abuse, use of trust and authority, meeting the child's needs (including physical and emotional) and developing relationships with the child's family. Research questions whether all offenders are preferential and that some are opportunistic or situational (where organisational factors increase the likelihood of offending).

Information: There have been several high profile enquiries into organisational CSA, ie CSA that has taken place in schools, religious institutions, sports and other youth-serving organisations. Common factors in these cases were: failure of staff & management to understand & implement safeguarding policies (including around sharing concerns), importance of staff and management understanding the dynamics of organisational abuse (including grooming), and the significance of organisational culture in minimising risk.

Research with offenders can teach organisations about how to prevent abuse and build strong safeguarding cultures. Some offenders showed previous patterns of rule breaking generally. Organisations where boundaries are adhered to in *every respect where staff perform a role* are likely to be the safest environments for children. There is no one single profile of an abuser so it is important to focus on specific behaviours instead. Adults should be prepared to act when they observe any behaviour which violates codes of conduct.