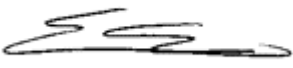




St. Helen's Catholic Primary School

LOW LEVEL CONCERNS POLICY

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Approved by Local Governing Committee and signed by Elsa Corr, Chair of Governors	
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POLICY FOR LOW LEVEL CONCERNS

Our Mission Statement

Respect yourself.

Respect everyone in our school community.

Respect everyone in our local community.

Respect everyone in our global community.

But most of all, respect God our Father in Heaven.

Aims of the Policy

This policy aims to

This policy aims to:

- promote an open and transparent safeguarding culture in which all concerns about adults are shared responsibly, recorded and dealt with appropriately;
- enable inappropriate, problematic or concerning behaviour to be identified and addressed at the earliest opportunity;
- minimise the risk of harm to pupils;
- ensure that all adults understand and maintain appropriate professional boundaries in accordance with the school's ethos, values and Staff Code of Conduct;
- ensure that all members of the school community understand their responsibility to report safeguarding concerns, regardless of their perceived seriousness;
- recognise patterns of behaviour and prevent concerns from escalating wherever possible; and
- ensure a clear distinction between low-level concerns and allegations which meet the harm threshold.

This policy is written in accordance with the Department for Education's statutory guidance *Keeping Children Safe in Education 2026* (KCSIE) and should be read alongside the school's Learning About Me Policy, Child Protection Policy, Staff Code of Conduct, Dealing with Allegations Against the Workforce Policy, Discipline and Dismissal Policy and Whistleblowing Policy.

Definitions

For the purposes of this policy, a low-level concern is any concern – no matter how small, and even if it amounts only to a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school 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.

The term 'low-level' does not mean insignificant. Concerns should be shared so that they can be considered in context and alongside any previous concerns or emerging patterns of behaviour.

Harm threshold

This threshold is defined as allegations that an adult has:

- Acted in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Acted towards a child in a way that indicates they may pose a risk of harm to children.
- Acted in a way that indicates they may not be suitable to work with children, including conduct that has happened outside of school.

The school recognises that low-level concerns can provide important information about an individual's behaviour and may identify patterns which, taken together, indicate a more serious safeguarding concern. All concerns will therefore be recorded, considered in context and reviewed as appropriate.

Roles & Responsibilities

Safeguarding is the responsibility of all members of the school community and everyone should be vigilant and act responsibly in order to keep our children safe. Within that, there are specific responsibilities attached to different roles:

The Local Governing Committee is responsible for:

- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines **clear expectations of staff conduct**.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The headteacher is responsible for:

- □ Receiving and overseeing concerns about adults working in or on behalf of the school.
- □ Determining, with appropriate advice where necessary, whether a concern is a low-level concern or meets the harm threshold. Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL is responsible for:

- □ Supporting the headteacher in considering safeguarding concerns and identifying any implications for individual pupils or wider safeguarding practice.
- □ Ensuring that any concerns relating to the safety or welfare of a child are addressed through the school's child protection procedures. Following all procedures outlined in this policy for

acting upon low-level concerns.

- Liaising with the headteacher, staff members, the Local Governing Committee and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the actions of a member of staff immediately.

Professional conduct and prevention

Appropriate and inappropriate actions

At St Helen's, we will ensure that all staff members are aware of the standards of appropriate actions expected towards pupils. Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their actions with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the actions of another adult is appropriate, this should be reported to the Headteacher immediately.

Concerning behaviour can exist on a wide spectrum, from inadvertent or thoughtless conduct, or behaviour that may appear inappropriate, through to behaviour intended to facilitate abuse.. Examples of inappropriate actions (not exhaustive) that would constitute a low-level concern that should be reported to the Headteacher include:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts
- Taking photographs of children on a personal mobile phone or device, contrary to school policy. 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
- Humiliating children, including shouting at them from a distance or making "aside" comments

which reflect a disparaging opinion of a child

Staff will be aware that some of the above low-level concerns may meet the harm threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages. Staff will also understand that context is important. Conduct that might ordinarily raise concern may be appropriate where it forms part of an agreed professional arrangement, has been properly risk assessed and is consistent with school policy.

Staff will also be made aware that actions which raise concerns may not be intentionally inappropriate, and that this does not negate the need to report. Staff members who engage in low-level inappropriate actions in relation to pupils thoughtlessly will be made aware and supported to reflect on and modify these actions in line with the Staff Code of Conduct. The headteacher will also evaluate whether additional training would be beneficial for any staff members about whom low level concerns have been raised, or the staff cohort as a whole where low-level concerning actions are seen more widely.

School culture

The school recognises that concerns about colleagues can be difficult to raise, particularly where there is a difference in role, status or seniority. We will therefore promote an open and transparent culture in which staff understand that safeguarding takes precedence over professional loyalty and that concerns about any adult should be reported without fear of criticism for doing so in good faith.

All staff will receive appropriate safeguarding and child protection training at induction, together with regular updates in accordance with statutory guidance and the school's safeguarding arrangements. All staff will read Part One of *Keeping Children Safe in Education* and will be familiar with the school's procedures for reporting concerns about adults.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic actions towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Safeguarding culture and our Catholic ethos As a Catholic school, our safeguarding culture is rooted in the inherent dignity and worth of every person. Our values, informed by Scripture and Catholic Social Teaching, require every member of our community to treat others with respect, compassion and integrity.

Where concerns arise, the headteacher will consider not only the conduct of the individual but also whether any aspect of the school's culture, systems, policies, training or working practices may have contributed to or failed to challenge that conduct. Any learning will be used to strengthen an open, transparent and accountable safeguarding culture.

Reporting Concerns

Safeguarding pupils takes precedence over professional loyalty to colleagues. Staff must report any concern about the conduct of an adult working in or on behalf of the school to the headteacher without delay, regardless of how minor the concern may appear.

Concerns should normally be reported verbally in the first instance and recorded in writing where requested. Staff must maintain appropriate confidentiality and share information only with those who need to know.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a concern relates to the headteacher, it must be reported to the Chair of Governors, who will determine the appropriate course of action and seek advice from the LADO where necessary.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the headteacher, who will, in turn, inform the employer of the subject of the concern. All concerns reported to the headteacher will be documented in line with Keeping Children Safe in Education.

Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out here and in the Staff Code of Conduct

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The headteacher, SLT and DSL(s) will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Self-reporting does not determine the outcome of any subsequent consideration or investigation; however, the circumstances of the self-report, including the individual's insight and response, may form part of the overall assessment.

Organisations or individuals using school premises

St Helen's may receive an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, where this is the case, we will follow our safeguarding policies and procedures, including informing the LADO.

Evaluating Concerns

Where the headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. The headteacher will consider the information available and determine whether the concern is consistent with the Staff Code of Conduct, constitutes a low-level concern, or may meet the harm threshold. Where there is any doubt, advice will be sought from the Local Authority Designated Officer (LADO). When seeking external advice, the headteacher will ensure they adhere to the Data

Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times. For a flow chart version of the decision-making process, please see Appendix I.

To evaluate a concern, the headteacher, SLT and or DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the actions displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and/or the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Dealing with Allegations Against the Workforce Policy.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken. This takes the form of a chronology and is held electronically by the headteacher.

Acting on concerns

Where the conduct is consistent with expected standards Where, following consideration, the conduct is found to be consistent with the Staff Code of Conduct and does not constitute a safeguarding concern, the headteacher will consider whether any further clarification, guidance or action is required.. The headteacher will also speak to the individual who shared the concern, outlining why the action reported is consistent with school standards and the law. The headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The headteacher will discuss the concern with the SLT/DSL to discern whether the actions, and the reporting of this actions, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and headteacher will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level

Where the headteacher determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The Headteacher holds a meeting with the individual about whom the concern was reported, during which they will:
 - Talk to the individual in a non-accusatory and sympathetic manner.

- Inform them of how their actions were perceived by the individual who reported the concern (without naming them, where possible).
- Clearly state what about their actions was inappropriate and problematic.
- Discuss the reasons for the actions with the individual.
- Inform the individual clearly what about their actions needs to change.
- Discuss any support that the individual may require in order to achieve the proper standards of actions.
- Allow the individual the opportunity to respond to the concern in their own words.
- The headteacher will ask the individual to re-read the Staff Code of Conduct.
- The DSL and the headteacher will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's actions and any other support measures implemented to ensure the staff member's actions improve.
- Where it is necessary to undergo an investigation into the actions, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's actions, they will be offered pastoral support, where appropriate.

The headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded, and securely stored in line with the school policy and the Data Protection Policy. The headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary and Dismissal Policy where actions and attitudes do not improve once it is brought to their attention. Where actions and attitudes do not improve over a longer period, the concerns will be escalated and dealt with in line with the Dealing with Allegations Against the Workforce Policy.

Where the concern is serious

The headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual of which the reporter may not be aware. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The headteacher will then follow the procedures laid out in the Dealing with Allegations Against the Workforce Policy.

Record Keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The headteacher will ensure that all records include the most accurate and up-to-date information and will store them electronically on the Safeguarding Drive. The headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The headteacher will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning patterns amongst the staff cohort as a whole. The headteacher will keep records of these reviews.

Where any concerning patterns have been identified with regard to a member of staff, the headteacher will decide on a course of action. Where a pattern has become so concerning that it meets the harm threshold, this will be referred to the LADO as soon as practicable.

Records of low-level concerns will be kept securely and confidentially, separate from the individual's personnel file unless the concern, or a pattern of concerns, also constitutes a conduct or employment matter which properly forms part of that record.

Records will be reviewed where appropriate so that patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern indicates that the harm threshold may be met, the matter will be referred to the LADO without delay.

There is no statutory timeframe for the retention and secure disposal of low-level concern records, but Keeping Children Safe in Education recommends that it is retained at least until the individual leaves their employment. The headteacher will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be retained securely at least until the individual leaves employment with the school. Thereafter, records will be retained or securely disposed of in accordance with the school's records retention schedule, data protection requirements and any applicable safeguarding guidance.

Low-level concerns will not normally be included in employment references. Safeguarding allegations that have been substantiated and meet the harm threshold should be included where relevant. A low-level concern may also be relevant where it forms part of a wider conduct or performance matter that would ordinarily be included in a reference, or where a pattern of behaviour has subsequently met the harm threshold.

Monitoring & Review

This policy will be reviewed annually by the headteacher and DSL and sooner where required by changes to statutory guidance, legislation, safeguarding practice or learning arising from concerns within the school.

Appendix I

Process to follow when reporting a low-level concern

