

Name of School	St Edward's Catholic Primary School
Policy review Date	September 2026
Date of next Review	September 2027
Who reviewed this policy?	Assistant Head Teacher Ms S Naz



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Aims

This policy forms part of our school's wider commitment to safeguarding and creating a culture of openness, trust, and transparency. It applies to all staff, volunteers, supply staff, and contractors working in or on behalf of the school within the primary school environment.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This will ensure that we can:

- identify inappropriate, problematic or concerning behaviour early,
- minimise the risk of abuse, and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Roles & Responsibilities

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment that enables them to learn and achieve their full potential. However, there are identified key adults in our school who have specific responsibilities under child protection procedures. This is the Designated Safeguarding Lead and the Deputy Safeguarding Leads.

Staff code of conduct and safeguarding policies

This low level concerns policy is in line with our staff code of conduct and safeguarding and child protection policies. We understand the importance of sharing low-level concerns, and the purpose of this policy is to outline how the school can create and embed a culture of openness, trust and transparency in which our school values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

Our trustees and governing body will ensure that the staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

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Our school will achieve the purpose of our low-level concerns policy by:

- ensuring their staff are clear about what appropriate behaviour is, and 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 (see below),
- addressing unprofessional behaviour/supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively/proportionately when they are raised
- helping identify any weakness in our school safeguarding system.

What a low-level concern is:

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/belief 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.

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

- being overfriendly with children and 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
- 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 in or on behalf of the school and from becoming the subject of potential false low-level concerns or misunderstandings.

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Sharing low-level concerns

This policy contains a procedure for sharing confidentially any low level concerns which is clear and easy to understand and implement.

All low-level concerns are shared initially with the designated safeguarding lead. The designated safeguarding lead will inform the head teacher of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The Head teacher will 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 designated safeguarding lead, the head teacher may wish to consult with the designated safeguarding lead and take a more collaborative decision-making approach.

Low-level concerns which are shared about supply staff and contractors will 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, the school will consult with their LADO.

Staff are encouraged and made to feel confident to self-refer, where, for example, they may find 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.

Concerns should be reported as soon as possible, within 24 hours of anyone becoming aware of them.

Recording low-level concerns

All low-level concerns should 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.

All records related to low level concerns are kept on a secure system, they must be kept confidential and comply with data protection laws.

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Records will be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies will be revised, or extra training delivered to minimise the risk of it happening again.

The school will retain such information at least until an individual leaves their employment.

Responding to low-level concerns

If a low level concern has been raised via a third party, the head teacher (or a nominated deputy) should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

References

Schools should only provide substantiated safeguarding concerns/allegations (including a group of low level concerns about the same individual) that meet the harm threshold in references.

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Review

This policy will be reviewed at least annually and as and when needed where updates or adaptations are needed.

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