The Rosary Catholic Primary School

Aspire, Believe, Achieve: Together in Christ

Low Level Concerns Policy

Policy Approved by:	Full Governing Body
Date of Approval:	November 2025
Date of next Review:	November 2026

The Rosary Mission Statement

'Together, God's children,

We realise our dreams,

Inspiring and encouraging one another to reach our true potential,

Transforming our world through our unique gifts.'

What is a low level concern?

For the purposes of this policy, a "low-level concern" is defined as any concern had about an individual's behaviour towards a child that does not meet the threshold for being considered an allegation (see below), or is otherwise not serious enough to consider a referral at the time of its reporting.

Low-level concerns often refer to behaviour on the part of an individual that is considered inappropriate in line with statutory safeguarding advice. A low-level concern could be a concern, no matter how small and even if no more than a 'nagging doubt' including a sense of unease as to the individual's behaviour particularly towards or around children.

Low-level concerns are differentiated from allegations. "Allegations" are defined in this policy as accusations that an adult has:

- *behaved in a way that has harmed a child or may have harmed a child; and / or possibly committed a criminal offence against, or related to, a child;*
- *and / or behaved towards a child in a way that indicates they may pose a potential risk of harm to children*
- *and / or behaved or may have behaved in a way that indicates they may not be suitable to work with children (Keeping Children Safe in Education 2022);*
- *and / or there is a pattern of low-level concerns which collectively amount to an allegation; and / or there is other information which, when considered, leads to an allegation.*

While low-level concerns are, by their nature, less serious than allegations, we understand that many serious safeguarding concerns (for example child sexual abuse), often begin with low-level concerns, such as subtle grooming by the offender. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

Self Reporting A low level concern about an adult

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct.

Where a staff member wishes to work outside of their contract with the school, they should first seek agreement with their Executive Headteacher, and a written confirmation placed in their employee file.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees

self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Low Level Concerns about others

We understand that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors.

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

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 and approach 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 behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

What Should I do If I have a low level concern?

The school promotes a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns to the Head of School (DSL) or Executive Head Teacher regardless of whether they relate to a fellow member of staff.

Where a low-level concern (including self-reports) exists, it should be reported to the Head of School (DSL) or Executive Head Teacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

If there are concerns about the Head of School (DSL) then these should be reported to the Executive Headteacher.

If there are concerns about the Executive Headteacher these should be reported to the Head of School or Chair of Governors.

Staff members should report their concerns by submitting a Low-level Concern Reporting Form. Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. However, the School encourages staff to feel comfortable about voicing any concerns openly. Completely anonymous disclosures are difficult to investigate. If a staff member wants to raise their concern confidentially, then the school will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concern. Staff will be protected from potential repercussions caused by reporting a genuine concern. However, if we conclude that a false allegation has been maliciously made, then the individual concerned may be subject to disciplinary action

How will a low level concern be handled?

The Head of School (DSL) and/or Executive Headteacher will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure.

Acting on Concerns

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

The Head of School (DSL) and/or Executive Headteacher will hold 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 behaviour was perceived by the individual who reported the concern (without naming them, where possible).

Clearly state what about their behaviour was inappropriate and problematic.

Discuss the reasons for the behaviour with the individual.

Inform the individual clearly what about their behaviour needs to change.

Discuss any support that the individual may require in order to achieve the proper standards of behaviour.

Allow the individual the opportunity to respond to the concern in their own words.

The Head of School (DSL) and/or Executive Headteacher will consider whether the individual should receive guidance, supervision or any further training.

Where considered appropriate in the circumstances, the Head of School (DSL) and/or Executive Headteacher may develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.

Where it is necessary to undergo an investigation into the behaviour, 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 behaviour, they will be offered pastoral support, where appropriate.

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 Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated.

Where the Head of School (DSL) and/or Executive Headteacher decides 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. Where this decision is made, the concern will be escalated, and dealt with as an allegation.

What records will be kept?

Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a central file which logs all low-level concerns and will be retained until the staff member reaches normal pension age or 10 years after if longer. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above; or
- the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.