



Low-Level Concerns Policy

Last Review: **16th January 2025**

Approved by: **Governing Body**

Date: **22nd January 2025**

Next Review Date: **16th January 2026**



Contents

Low-level Concerns Policy	3
Roles and responsibilities.....	3
Prevention amongst staff.....	5
Appropriate and inappropriate behaviour	5
School culture	6
Evaluating school culture following concerns	6
Reporting concerns.....	7
Self-reporting.....	7
Evaluating concerns	8
Acting on concerns.....	9
Where the concern is unfounded	9
Where the concern is low-level	9
Low-Level Reporting Form	11



Low-level Concerns Policy

For the purposes of this policy, a **low-level concern** is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Appropriate and inappropriate behaviour subsection of this policy.

Low-level concerns are differentiated from concerns that can cause **harm**. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- Behaved 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.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, they are not insignificant and the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low level concerns, e.g. being overly friendly with children. 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.

Roles and Responsibilities

The governing body 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 behavioural expectations.
- 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 Head of School is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Following all procedures outlined in this policy for acting upon low-level concerns.
- 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.
- Liaising with all SLT members, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.
- 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 behaviour of a member of staff immediately.



Prevention Amongst Staff

Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour 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 behaviour 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 behaviour of another adult is appropriate, this should be reported to the DSL immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Head of School include, but are not limited to:

- **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 their personal mobile phones or any personal devices.**
- **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.**

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre- approved, one-to-one meeting with a child behind a



closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Head of School will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School Culture

The school understands 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. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct. Staff will address any questions they have regarding safeguarding to the Head of School/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 behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Evaluating School Culture Following Concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Head of School will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.



Reporting Concerns

The school will promote 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, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Head of School immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious. Staff members will report their concerns to the Head of School, verbally and by submitting a Low-level Concern Reporting Form. When submitting concerns, staff will take care to ensure that they observe Confidentiality Policy and protect the identity of all individuals to which the concern pertains as far as possible.

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 low-level concern relates to the Head of School, it should be reported to the chair of Governors.

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 Head of School, who will, in turn, inform the employer of the subject of the concern. All concerns reported to the Head of School will be recorded.

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 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 Head of School and SLT 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.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Evaluating Concerns

Where the Head of School 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. When deciding if a concern is low-level, the Head of School will discuss the concern and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the Head of School 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.

To evaluate a concern, the Head of School 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 behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and 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.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- 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.

Acting on Concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Head of School will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Head of School will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Head of School 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 Head of School will discuss the nature of concern with SLT to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the SLT will work together to resolve this with input from other staff members, as necessary.

Where the Concern is Low-Level

Where the Head of School 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 Head of School 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 individual will be asked to re-read the Staff Code of Conduct, depending on the nature of the concern.

- The Head of School will consider whether the individual should receive guidance, supervision or any further training.



- Where considered appropriate in the circumstances, the Head of School will 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 Head of School will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the UK GDPR. The Head of School will ensure that these records are kept organised and up-to-date, and that it is easy to refer back 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 Staff Disciplinary Policy 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 and dealt with in line with the Child Protection and Safeguarding Policy

Low-level Concern Reporting Form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the form overleaf, including as much detail as you can, and return it directly to the Head of School or the DSL in her absence. Please refrain from discussing this concern with anyone other than the Head of School or in her absence the DSL until the matter has been dealt with. We ask that you keep all details, including the name of the staff member to whom the concern pertains, confidential.

Low-Level Reporting Form

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with St. Clement’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved 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;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Where possible please speak with the Head of School as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Head of School. When completed, please pass this form to the Head of School. If the concern is about the Head of School, please pass it onto the Chair of Governors or email them at JCook@stclements.surrey.sch.uk



DETAILS OF LOW LEVEL CONCERN

Name of staff member: _____

Role of staff member: _____

Name of reporting staff member: _____

Date of Incident: _____

Child's Name: _____

Details of your concern:

Signed: _____

Role: _____

Time: _____ Date: _____

Information Received By: _____

Role: _____

Time: _____ Date: _____

Full Details of Actions Taken:
