



# Low Level Concerns Policy

<b>Policy Code:</b>	SG6
<b>Policy Start Date:</b>	July 2022
<b>Policy Review Date:</b>	July 2023



## **1. Legal framework**

- 1.1. This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

UK General Data Protection Regulation (UK GDPR)  
Data Protection Act 2018  
DfE 'Keeping children safe in education'  
DfE 'Working Together to Safeguard Children'

- 1.2. This policy operates in conjunction with the following Trust and school policies:

Child Protection and Safeguarding Policy  
Staff Code of Conduct  
Positive Handling Policy  
Allegations of Abuse Against Staff Policy  
Whistleblowing Policy  
Data Protection Policy

## **2. Definitions**

- 2.1. 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

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- 6.2. Staff will report all safeguarding concerns they have to the Headteacher or DSL 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.
- 6.3. Staff members will report their concerns to the Headteacher or DSL, or by submitting a Low-level Concern Reporting Form. When submitting concerns, staff will take care to ensure that they observe the Allegations of Abuse Against Staff Policy, and protect the identity of all individuals to which the concern pertains as far as possible.
- 6.4. Staff members may request anonymity when reporting a concern, and the Trust will endeavour to respect this as far as possible. The Trust 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.
- 6.5. Where a low-level concern relates to the Headteacher, it should be reported to the chair of Local School Board, Trust Designated Safeguarding Lead or Director of HR.
- 6.6. Where a low-level concern relates to the CEO or a member of ELT, it should be reported to the Chair of the Trust Board.





- 9.4. The DSL 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 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.

- 9.5. The DSL asks the individual to re-read the Staff Code of Conduct.
- 9.6. The DSL and the Headteacher will consider whether the individual should receive guidance, supervision or any further training.
- 9.7. 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 behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- 9.8. 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.
- 9.9. Where any pupil or other individual has been made to feel uncomfortable by the



10.11. The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

## **11. Monitoring and review**

11.1. This policy will be reviewed annually by the Trust Designated Safeguarding Lead, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the Trust.

### 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 below form, including as much detail as you can, and return it directly to the Headteacher or DSL. Please refrain from discussing this concern with anyone other than the Headteacher or DSL until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern, e.g. manager, colleague	
Details of concern	
<p><b>Please include as much detail as possible. Think about the following:</b> What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</p>	
Details of any children or young people involved	

