

Shottery St Andrew's CE Primary School



Anchored in faith we shine!

This policy is underpinned by our school vision based on the scripture,

*'Let your light shine before others,
that they may see your good deeds and glorify your Father in heaven.'*
Matthew 5:16

Reporting Low-level Concerns Policy

Date adopted by Governors:	September 2025
Date for policy review:	September 2027
Person responsible for review:	Headteacher
Signed by Chair of Governors	

This policy is based on concerns that do not meet the harm threshold in Part 4 of the document Keeping Children Safe in Education.

This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 of KCSiE.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns

The term 'Low-Level' concern is any concern – no matter how small – 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- 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
- Sharing Low-Level concerns
- We recognise the importance of creating a culture of openness, trust and transparency to
- encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Have clear policies and procedures
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Reporting a low-level concern

- Low level concerns about a member of staff should be reported to the Headteacher as per the school's Child Protection procedures.
- If the concern is about the Headteacher this should be reported to the Chair of Governors.
- Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.
- Staff should use the school's Low-Level Concerns Reporting Form (Yellow Form)

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record keeping

All low-level concerns will be recorded in writing (Yellow form Appendix 1) . In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a low-level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

If the concern relates to volunteers, or any other concerns arise, school can contact the LADO for further advice.

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Logging a concern about the behaviour of a member of staff or volunteer

(N.B. This form should be used for recording and reporting all allegations of abuse by and all concerns about the behaviour of staff and volunteers that are in breach of the Staff Behaviour policy (code of conduct). All allegations and all such concerns must be reported to the Headteacher* without delay)

About the member of staff or volunteer whose behaviour is causing concern or is subject of the allegation:	
Name (print):	
Job Title (print):	
Date (of writing this record):	Time (of writing this record):
About the person reporting the concern/allegation and completing this form:	
Name (print):	
Job Title (print):	
Signature:	
What is the nature of the specific allegation or concern about behaviour (brief headline)?	
Record the following factually: <u>When</u> ? (date & time of incident); <u>What</u> exactly has raised your concern (what happened, what did you see/hear/find out or what were you told)? <u>Where</u> did your concerns arise? <u>Who else</u> - were any pupils or other staff present or involved? N.B. Please record any direct disclosures/statements/allegations/comments using the child or adult's exact words in quotation marks	
NB if additional pages are used, these must be attached securely to this form	
Did you do anything or speak to anyone else before reporting the incident/concern to the Headteacher* (if yes, please provide names and details)?	
Any other relevant information:	
Date and time incident/concern was first shared with Headteacher* <u>N.B.</u> It is not necessary to complete this form before speaking to the Headteacher* – the circumstances may mean you need to speak to the Headteacher* first as a matter of priority:	

Check to make sure your report is clear; and will be clear to someone else reading it next year

NOW PLEASE PASS THIS FORM TO THE HEADTEACHER*
(Headteacher* to complete sections overleaf)

* In the event that the allegation/concern is about the Headteacher, this form must be passed to the Chair of Governors, who should complete the second part of the form.

Form D (yellow paper) – This form must be completed in black ink

(Following sections to be completed by Headteacher*)

Time & date information received by Headteacher* <u>and</u> from whom	
Action taken (e.g. discussion with LADO; PoT MARF submitted to LADO; advice taken from HR/ Legal/ Chair of Governors)	
Date, time, name, role, organisation advice provided by	
If decision not to refer to LADO, state reason	
Parents informed? Yes/ no State reasons if no	
Outcome (e.g. Referral to LADO, PoT meeting convened, HR advice taken, Police <u>investigation, internal investigation</u> , informal management advice given and recorded, no further action)	
Signed	
Printed Name	
Date	

Signature, date and time when member of staff submitting this form received confirmation of receipt of report/allegation from Headteacher*