



# Worth Valley Primary School



## Low-level Safeguarding Concerns Policy

Introduced: 13 September 2024

Reviewed: November 2025

Next review: November 2026

Signed by:

 _____	Headteacher	Date: 20.11.25 _____
 _____	Chair of governors	Date: 20.11.25 _____

## **Legal framework**

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 (2024) 'Keeping children safe in education 2024'
- DfE (2024) 'Working Together to Safeguard Children'

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Physical Intervention Policy
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy
- Data Protection Policy

## **Definitions**

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.

The term 'low-level' concern does not mean that it is insignificant – a low-level concern is any concern that suggests an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

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 allegations 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 or may have behaved in a way that indicates they may not be suitable to work with children

While low-level concerns are less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns 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 have an opportunity to escalate from low-level to serious.

## 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, headteacher or other nominated person 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 DSL 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 mobile phones, 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

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 headteacher will also evaluate whether additional training would be beneficial for any staff

At Worth Valley Primary School, the headteacher is also the DSL and as such will be the ultimate decision maker in respect of all low-level concerns; however, they may take a more collaborative approach alongside the deputy DSLs to make a decision.

Staff members will report their concerns to the headteacher or deputy headteacher verbally, or by submitting a [Low-level Concern Reporting Form](#). When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and the Allegations of Abuse Against Staff 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 headteacher, it should be reported to David Harrison, Leading Learners Director of Education.

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 headteacher, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the headteacher will be documented in line with the Records Management Policy.

In line with the [Evaluating concerns](#) section of this policy, if the school receives an allegation of a low-level safeguarding concern regarding an organisation that has hired the school premises, the school will follow its usual safeguarding procedures and process for managing allegations.

### **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 expected professional 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 headteacher and DSL 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.

If a concern has been raised via a third party, the headteacher will 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

### **Where the concern is low-level**

Where the headteacher 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 DSL 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 headteacher (DSL) will ask the individual to re-read the Staff Code of Conduct if appropriate and consider whether the individual should receive guidance, supervision or any further training
- 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
- 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 headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Data Protection Policy. The headteacher 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 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 and dealt with in line with the Allegations of Abuse Against Staff Policy.

In line with the Data Protection Policy, records will be kept confidentially and held securely to comply with the Data Protection Act 2018 and the UK GDPR. The school will consider how long information needs to be retained; however, it will be retained at least until the individual leaves their employment.

When providing employment references, the school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated low-level safeguarding concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not normally be included in any reference.

The headteacher will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

### **Monitoring and review**

This policy will be reviewed annually by the headteacher (DSL), and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. The next scheduled review for this policy is September 2025.

**Details of any children or young people involved**

<b>Name(s)</b>	
<b>Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.</b>	

**Next steps**

<b>What would you like to see happen in response to your concern?</b>		
<b>Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.</b>	<b>Yes</b>	<b>No</b>
<b>Please state any other information that you believe is relevant to the processing of this concern.</b>		

<b>Signature</b>	
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**For use by safeguarding team upon receipt of concern**

<b>Date and time concern received</b>	
<b>Signature of DSL or deputy DSL</b>	
<b>Actions to be taken (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)</b>	
<b>Rationale for deciding on actions above</b>	