



Low Level Concerns Policy

2026 – 2027

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'The Love of Christ Shines Here'

Our School is Christ-centred where Gospel values permeate our daily lives.

We extend our hand of friendship to the wider community in the spirit of love, peace and justice.

We create opportunities to celebrate the uniqueness of every child and nurture them through a stimulating and enriching curriculum.



Our Lady and St Philomena's Catholic Primary School

Low Level Concerns Policy

1. Statement of Intent

Our Lady and St Philomena's Catholic Primary School understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to through the Staff Code of Conduct. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

2. 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 'Keeping children safe in education' (current edition)
- DfE '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

3. 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 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 relevant subsections 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, the school understands that many serious safeguarding concerns often begin with low-level concerns, such as 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.

4. 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 Designated Safeguarding Lead (DSL) has been appointed for the school, 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 Headteacher is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns about staff, 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.
- 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.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The Designated Safeguarding Lead (DSL) is responsible for serving as a primary point of contact for staff concerns, assessing whether issues constitute low-level concerns or allegations, following policy procedures, liaising with relevant stakeholders and agencies, and maintaining secure, accurate records of all incidents and actions taken.



5. 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.

Additionally, staff must recognise all pupils under 18 as children by law, avoiding assumptions of maturity or treating them like peers. Any doubts regarding the appropriateness of another adult's behaviour must be reported immediately to the DSL or Headteacher.

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 or Headteacher include, but are not limited to:

- **Being overly friendly with children** - including communicating with a child through personal social media, allowing inappropriate or personal conversations, or subscribing to/following pupil social media accounts.
- **Having favourites** - such as calling pupils by pet names, using terms of endearment, or buying pupils gifts.
- **Taking photographs of children** on personal mobile phones or devices.
- **Engaging with a child** on a one-to-one basis in a secluded area.
- **Humiliating children.**

Staff will be aware that some low-level concerns may meet the harms threshold depending on context, such as the child's age or needs, while some incidents may be entirely appropriate in context (e.g., a pre-approved meeting with a school counsellor). Inadvertent behaviour must still be reported, and the school will support staff to correct it through guidance or additional training.

6. School Culture

The school understands that identifying early signs of harmful behaviour can be difficult and that staff may hesitate to report colleagues. Staff are encouraged to maintain an attitude that "abuse can happen anywhere" and by anyone, regardless of authority or role.

All staff will receive low-level concerns training during induction, with refresher training conducted as necessary. The school will foster an environment where professional boundaries are strictly respected and pupils are not treated as friends.

7. Evaluating School Culture Following Concerns



The Headteacher will regularly review whether the school's culture has enabled any inappropriate behaviour to occur. Following any evaluation, the Headteacher will implement changes to policies or training to maintain an open, transparent, and safe culture.

8. Reporting Concerns

The school prioritises safeguarding pupils above any professional loyalties. Staff must report all safeguarding concerns to the Headteacher or DSL immediately. For specific incidents, reports must be made within 24 hours where possible. Reports can be made verbally or by submitting a Low-level Safeguarding Concern Form.

- **Anonymity:** The school will respect requests for anonymity as far as possible but cannot promise it if required for fair disciplinary hearings. Staff are fully protected from repercussions under the Whistleblowing Policy.
- **Concerns about the Headteacher:** If a low-level concern relates to the Headteacher, it must be reported directly to the Chair of the Governing Body.
- **Contractors and Supply Staff:** Concerns regarding supply staff or contractors must be reported to the Headteacher, who will notify their employer.

9. Self-Reporting

The school encourages a culture of approachability where staff can self-report if they feel their behaviour was compromised, could be misinterpreted, or fell below the Staff Code of Conduct. Self-reporting will not grant automated alignment with more favourable outcomes, but the staff member's self-awareness and intentions will be fully considered during evaluation.

10. Evaluating Concerns

When a concern is raised, the DSL and Headteacher will work together to evaluate it. The Headteacher will use professional judgement to determine if it is low-level or requires immediate escalation. If there is any doubt about meeting the harm threshold, the Headteacher will seek advice from the Local Authority Designated Officer (LADO).

Evaluation steps include:

- Speaking to the individual who raised the concern to gather facts.
- Reviewing the information against the Staff Code of Conduct and the law.
- Checking for previous low-level concerns about the same individual to see if a pattern meets the harms threshold.
- Speaking to the staff member involved to allow them to respond.

11. Acting on Concerns

Where the concern is unfounded

If evaluation reveals the behaviour was completely consistent with the Staff Code of Conduct and the law, the Headteacher will speak to the staff member to discuss why the behaviour may have been misconstrued and how to avoid misunderstandings in the future. The Headteacher will also reassure the reporter that their report was handled appropriately, ensuring they are not discouraged from raising future concerns. The DSL and Headteacher will review if any school policies or training require clarification to prevent similar ambiguities.



Where the concern is low-level

If the concern is verified as low-level, the school will respond in a sensitive, proportionate manner using the following steps:

- The DSL will hold a non-accusatory, sympathetic meeting with the individual to inform them of how their behaviour was perceived, clarify why it was problematic, and outline what needs to change.
- The individual will be given an opportunity to respond to the concern in their own words.
- The DSL will instruct the individual to re-read the Staff Code of Conduct.
- The DSL and Headteacher will consider whether guidance, supervision, or further training is required.
- If appropriate, the Headteacher will create a structured action plan with the individual to monitor improvement.
- Any investigations will be handled discreetly, and pastoral support will be offered to any pupils or individuals who were made to feel uncomfortable by the behaviour.

Repeated low-level concerns or a failure to improve after support has been put in place will result in escalation, potentially leading to disciplinary procedures or actions under the Allegations of Abuse Against Staff Policy.

Where the concern is serious

If the Headteacher determines that the concern is serious - either immediately or when viewed alongside a pattern of previous evidence - the concern will be escalated to an allegation and handled strictly under the school's Allegations of Abuse Against Staff Policy.

12. Record Keeping

The school will retain all records of low-level concerns, including those found to be unfounded. The Headteacher will securely store these in a confidential, electronic low-level concerns file.

Records must include:

- A clear, comprehensive summary of the concern and the context in which it arose.
- Details of how the concern was followed up, resolved, and any decisions reached.
- The name of the reporter (anonymity will be respected as far as reasonably possible).

The DSL will periodically review these records to check for concerning behavioural patterns across the staff cohort. Records will be kept confidential, password-protected, and strictly separate from personal files unless a low-level concern is reclassified as a serious allegation or meets the harms threshold, at which point records will be moved to the individual's personnel file.

Employment References: The school will only share substantiated safeguarding allegations or a verified pattern of low-level concerns that met the harm threshold in future references. Unfounded, false, or malicious concerns will never be included.

13. Monitoring and Review



This policy will be reviewed annually by the Headteacher and the Designated Safeguarding Lead to adapt to new safeguarding requirements or insights from internal cultural evaluations. At every review, the updated policy must be formally approved by the Governing Body.