Low Level Safeguarding Concerns Policy

Academic year 2026 to 2027

Love • Respect • Service • Ambition

Review completed 26 October 2026. Next planned review October 2027, or earlier following relevant change.

Policy owner: Headteacher and Designated Safeguarding Lead. Approval authority: Local Governing Body under the Trust scheme of delegation.

Status: Revised for approval. Approval date and effective date are to be recorded by the authorised body on ratification.

This edition updates the supplied policy for 2026–27. Existing legal duties apply irrespective of the policy approval date. Staff must follow current safeguarding and safety procedures while approval is completed.

Statement of intent

Sacred Heart Catholic Academy 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. This policy covers all adults working in or on behalf of the Academy, including employees, supply staff, trainee teachers, volunteers and contractors.

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. 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.

1. 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 and UK GDPR as amended, including applicable commenced provisions of the Data (Use and Access) Act 2025
- DfE (2026) ‘Keeping children safe in education 2026’
- DfE (2026) ‘Working together to safeguard children 2026’ This policy operates in conjunction with the following school policies:
- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy
- Data Protection Policy

2. 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.

3. Roles and responsibilities

The Local Governing Body will be 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 headteacher will be 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.
- 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 DSL will be 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.

- Liaising with the headteacher, staff members, the Local Governing Body and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and keeping records of decisions made regarding safeguarding concerns, including the rationale for those decisions.

Staff will be 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.

4. 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 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 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 inappropriate, 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 headteacher 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.

5. 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 headteacher, DSL, or deputy immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy.

Report immediately; there is no 24-hour waiting period. An older concern must still be reported. Act at once on any immediate danger and contact emergency services or children's social care where needed. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Where the DSL is informed of low-level concerns, they will inform the headteacher in a timely fashion according to the nature of the concerns. The headteacher will be the ultimate decision maker in respect of all low-level concerns; however, they may take a more collaborative approach with the DSL 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 concern relates to the headteacher, report directly to the Chair of Governors through the school office or the Trust safeguarding route; do not refer it to the headteacher. If the Chair is implicated, unavailable or conflicted, use the Trust Chair or CEO route. Staff may contact the LADO directly where necessary. Anyone implicated must not manage their own case.

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. Where a trainee teacher is involved, the headteacher will liaise promptly with the training provider and placement employer as appropriate, sharing responsibility for safeguarding and coordinated action.

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.

6. 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.

7. Evaluating concerns

Where the headteacher 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 headteacher will discuss the concern with the DSL and the deputy headteacher, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold.

When seeking external advice, the headteacher 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 headteacher and DSL 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 and dealt with alongside the Allegations of Abuse Against Staff Policy.
- 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 give them an opportunity to respond, but only at a stage consistent with LADO or police advice where the harm threshold may be met; do not prejudice an external investigation.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

8. 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 headteacher 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 headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The headteacher 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 headteacher will discuss the concern with the DSL (and if they have been involved, the LADO) 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 DSL and headteacher will work together to resolve this with input from other staff members, as necessary.

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 DSL will ask the individual to re-read the Staff Code of Conduct depending on the nature of the concern.
- The DSL and the headteacher will 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 Records Management Policy and 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.

Where the concern is serious

The headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The headteacher will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

9. Record keeping and references

The headteacher will keep a secure written record of each concern, its context, the reporting person where known, follow-up, action, decisions, outcomes and rationale. Access is strictly need-to-know. Records will be held in the confidential low-level concerns system, with a cross-reference where a case becomes a formal allegation; multiple concerns must remain readily identifiable for pattern review.

The headteacher and DSL will review records regularly for patterns and wider cultural issues. Refer to the LADO promptly where an individual incident or pattern may meet the harm threshold. Seek HR and safeguarding advice before taking disciplinary action where external agencies may need to lead.

KCSIE recommends retaining low-level records at least until the individual leaves. The Academy's existing local retention period of employment plus six years is retained, subject to the Trust retention schedule, lawful necessity, secure deletion and any safeguarding or legal hold. Do not delete material relevant to an open case. Allegations meeting the harm threshold follow the separate KCSIE allegation-retention rules and Trust schedule; a blanket 20-year rule is not applied to all low-level concerns.

Low-level concerns relating exclusively to safeguarding must not be included in references. Substantiated safeguarding allegations meeting the harm threshold are handled under KCSIE; relevant substantiated misconduct or poor performance may be referenced in the normal way. HR advice will ensure references are factual, fair and accurate; false, malicious, unfounded or unsubstantiated allegations must not be included.

10. Monitoring and review

This policy will be reviewed annually by the headteacher and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school.

11. Information sharing

The school will follow Working together to safeguard children 2026 and the September 2026 information-sharing statutory guidance, including the duty effective from 30 September 2026. Necessary and proportionate safeguarding sharing must not be delayed by a mistaken belief that consent is always required. Record what is shared, with whom, why and under which lawful conditions; protect special-category and criminal-offence information and explain sharing where safe. Staff training will include KCSIE 2026 Part one for all staff.

Appendix A Low level concern reporting form

Report urgent concerns immediately; do not wait to complete this form. Give the form directly to the headteacher or DSL. Concerns about the headteacher go to the Chair or Trust route in section 5. Keep information confidential and do not investigate independently.

Reporter name and role optional if anonymity requested

_____

Date and time of report

_____

Name and role of adult concerned

_____

Relationship to the adult concerned

_____

What happened including exact words dates location witnesses and why this concerns you

_____
_____
_____

Children involved and any immediate risk or action already taken

_____
_____
_____

Other relevant information and availability for follow up

_____

Reporter signature if provided

_____

For authorised recipient

Record date/time received, recipient, initial safety action, threshold assessment, LADO/agency advice, action, decision and rationale, outcome, review date and notification to the headteacher. Use a continuation sheet where needed. Store in the restricted system.

Review sources and related guidance

Keeping children safe in education 2026

Working together to safeguard children 2026

Information sharing to safeguard children and young people September 2026

Guidance checked on 26 October 2026. Use the current version on the official source page and review this policy sooner if relevant requirements change.