Schools HR Policy & Procedure Handbook

Trinity C of E Primary School

Managing Low Level Safeguarding Concerns for Employees Policy & Procedure

This Policy/Procedure has been shared with the following professional associations and Trade Unions representing Teachers, Headteachers and Support Staff:

- National Education Union
- National Association of Schoolmasters Union of Women Teachers
- National Association of Headteachers
- Association of School and College Leaders
- Unison
- GMB

This policy has been adopted by the governing body of

on

28th September, 2026

September 2025

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Managing Low Level Safeguarding Concerns for Employees Policy & Procedure

1. Introduction

Trinity C of E 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. 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 (2025) 'Keeping children safe in education (2025)'
- DfE (2023) 'Working Together to Safeguard Children'

This policy operates in conjunction with the following school policies:

- Safeguarding and Child Protection Policy
- Maintaining Appropriate Relationships with Pupils Policy
- Professional Code of Conduct for Staff in Schools
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy

3. Definitions

For the purposes of this policy, a low-level concern is defined as any concern held about an adult's behaviour towards a child that does not meet the threshold for being considered an allegation (see below) or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns often refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Professional Code of Conduct for Staff in Schools and the Maintaining Appropriate Relationships with Pupils Policy.

Low-level concerns are differentiated from allegations, which are 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 or may have behaved in a way that indicates they may not be suitable to work with children.

While low-level concerns are, by their nature, less serious than allegations, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. subtle grooming by the offender. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

4. Roles and responsibilities

The governing body is responsible for ensuring that:

- the school complies with its duties under child protection and safeguarding legislation.
- policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- there is an effective Code of Conduct that outlines behavioural expectations.
- that a suitably trained Designated Safeguarding Lead (DSL) has been appointed and is supported by suitably trained deputies.
- there are robust reporting arrangements, including multi-agency collaboration.
- 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, 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 members have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL is responsible for:

- Being a point of contact for all staff members 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 governing body and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the 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.
- 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.
- Reporting any behaviours of themselves which could be misinterpreted or which the individual feels appropriate to bring to the attention of the DSL/Headteacher.

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.

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 Headteacher and/or DSL 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 Headteacher and/or DSL include:

- 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 personal mobile phones or devices.
- 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.

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 correct this behaviour in line with the Professional Code of Conduct. The headteacher and/or DSL 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 Professional Code of Conduct and the Maintaining Appropriate Relationships with Pupils Policy, and will address any questions they have regarding safeguarding to the Headteacher and/or 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 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 and/or DSL 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.

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 whether they relate to a fellow member of staff.

Staff will report any and all safeguarding concerns they have to the Headteacher and/or DSL immediately in line with the procedures laid out in the Safeguarding and Child Protection 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.

Staff members will report their concerns to the Headteacher and/or DSL (or deputy DSL) verbally, or by submitting a Low-level Concern Reporting Form. When submitting concerns, staff will take care to ensure that they do so confidentiality and observe the Allegations of Abuse Against Staff Policy and protect the identity of all individuals to which the concerns pertain 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 the chair of governors.

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 and/or DSL will be documented in line with the data protection.

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 standards set out in the Professional Code of Conduct or violates the Maintaining Appropriate Relationships with Pupils Policy.

The school generally 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 or in a way that could be construed as inappropriate upon reflection. The Headteacher and DSL will, to the best of their ability, 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 when a final decision is being made on the severity of the incident.

7. Evaluating concerns

Where the Headteacher and/or DSL 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/or the deputy DSL and will seek advice from external agencies (for example the LADO or HR) where there is any doubt about how seriously to take the concern. When seeking external advice, the DSL will ensure they do so confidentially, and the in accordance with the Safeguarding and Child Protection 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 Professional 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 (for example the LADO) when in doubt over the course of action to follow.

- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- 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 is consistent with the Professional Code of Conduct, the Maintaining Appropriate Relationships with Pupils Policy 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 policies 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 to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the schools 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.

Where the concern is low-level:

Where the Headteacher determines that a concern is low-level, they will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- 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.
    - Allow the individual the opportunity to respond to the concern in their own words.
    - Inform the individual clearly about how their behaviour needs to change.
    - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.

- The DSL asks the individual to re-read the Professional Code of Conduct and/or the Maintaining Appropriate Relationships with Pupils Policy, 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 accordance with data protection. The DSL 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. Where behaviour does not improve over a longer period of time, the concerns may also be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy. It is unlikely that a low-level concern will result in disciplinary procedures; however, where behaviour does not improve once it is brought to their attention it may be necessary to deal with such cases in line with the Schools Disciplinary Procedure.

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

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Headteacher will ensure that all records include the most accurate and up-to-date information and will store them confidentially. The Headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL and Headteacher will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will make records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the headteacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual about whom there has previously been low-level concerns, or where a low-level concern is reclassified as an allegation, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The DSL will ensure that all records are kept in a manner that is consistent with data protection. Records will be confidential, kept password-protected, and will be securely destroyed after the staff member to whom the concerns pertain has left the school.

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.

10. Monitoring and review

The Governing Body will monitor the outcomes and impact of this policy/procedure on an annual/bi-annual basis in conjunction with school representatives.

This procedure will be reviewed no later than 2 years by Human Resources in consultation with Trade Unions.

Appendix A

Low-level Concern Reporting Form

Thank you for reporting your concerns, the school is grateful to you for taking the safety and welfare of our pupils so 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 of the 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 who is reporting the concern, e.g. manager, colleague	
Details of concern	
Please include as much detail as possible. Think about the following: 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 Professional Code of Conduct or other school policies and procedures?	

Details of any children or young people involved		
Name(s)		
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.		
Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the Headteacher and DSL to discuss your concern? Please circle as appropriate.	**Yes**	**No**
Please state any other information that you believe is relevant to the processing of this concern.		
Signature & Date		
For use by safeguarding team upon receipt of concern		
Date and time concern received		
Signature of DSL or deputy DSL		
Actions to be taken, e.g. no action, investigation, reclassification as allegation.		