

Low Level Concerns Policy



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OUR VALUES

Romero Catholic Academy Trust is a family of Catholic schools serving the needs of children and young people in the Diocese of Salford, covering the areas of Lancashire, Blackburn with Darwen and Calderdale. To achieve this, we will uphold four key values:

FAITH: TO NURTURE OUR BELIEF IN GOD

- Inspired by the vision of Bishop John, we will provide an authentic passing-on of our Catholic faith.
- Our schools will be nurtured by the Word of God.
- Our pupils will come to an understanding of what it means to be loved by God and the responsibilities that come from loving God.
- Our schools are worshipping communities characterised by vibrant liturgy and prayer.

SERVICE: TO LIVE OUT THE RESPONSIBILITIES OF OUR FAITH BY SERVING OTHERS.

- We will always act in the service of the pupils in our care.
- In our schools we will educate our children to be the next generation of the stewards of God's creation.
- We embrace Catholic social teaching and work for the Common Good with a preferential option for the poor.
- We are outward facing, acknowledge our place in the wider educational system and accept our civic responsibility.

ASPIRATION: TO ASPIRE TO FULFIL THE POTENTIAL OF EACH INDIVIDUAL, CREATED UNIQUELY IN THE IMAGE OF GOD.

- We will work to fulfil the potential of each member of our community by providing an education that develops the whole person, including high quality Religious Education.
- Our schools will have a relentless focus on achievement. The quality of education in our schools will be 'at least as academically distinguished as that in the other schools of the area.' (Can. 806.2)
- Every member of our community will be provided with the knowledge, skills and attitudes needed to succeed in school and in the next stage of their lives.
- Through high quality and relevant continuing professional development, we will invest in our staff.
- Decision making will weigh up the Common Good and be made in a timely way.
- We will always focus on the solution to a problem.

COLLABORATION: TO WORK COLLABORATIVELY; SHARING AND FOSTERING THE STRENGTHS AND EXPERTISE OF ALL.

- A spirit of solidarity leads us to accept a shared responsibility for all.
- We recognise the concept of subsidiarity; that decisions will be made as locally as possible.
- Improvements across our family of schools will be secured by utilising the skills and experience in the trust.
- Wherever possible, we will take care to involve and inform people in decision making.
- We believe in the importance of open, honest and positive communication.

STATUTORY GUIDANCE WHICH UNDERPINS LOW LEVEL CONCERN'S POLICY

Under the Children Act 1989 and 2004 (England and Wales), there is a legal duty to safeguard and promote the welfare of children, requiring organizations to take appropriate action if concerns arise regarding a child's safety. The Education Act 2002 reinforces these obligations by mandating that schools implement effective safeguarding procedures and imposing duties on local authorities and governing bodies to report and act on concerns. Further guidance is provided by Keeping Children Safe in Education (KCSIE) (England), which emphasizes the importance of identifying, recording, and addressing low-level concerns about staff behaviour. The latest version requires schools and educational settings to establish clear processes for handling low-level concerns, ensuring that early signs of inappropriate conduct are managed transparently and effectively to maintain a safe environment for children. Additionally, the Human Rights Act 1998 underpins these safeguarding responsibilities by protecting the right to privacy (Article 8) and ensuring fair treatment (Article 6), balancing the need to investigate concerns with respecting the rights of staff and children involved.

The Data Protection Act 2018, includes a specific provision which permits organisations to process even the most sensitive personal data where it is necessary for the purposes of protecting children from harm.⁴⁴ For schools and colleges in England, it is clear, from KCSIE, that low-level concerns recording will meet the relevant threshold of necessity.

PURPOSE OF THE POLICY

The purpose of the Romero Catholic Academy Trust's Low-Level Concerns Policy is to foster a culture of transparency, trust, and safeguarding, ensuring the safety and well-being of all pupils while maintaining the highest standards of professional conduct.

This policy is applicable to all staff employed by Romero Catholic Academy Trust and relates to behaviours whilst in work and outside of work which may cause reason for concern.

This policy provides a clear framework for staff to report and address behaviours that do not meet the threshold for significant harm but may be inconsistent with the Trust's values or code of conduct. By encouraging the early identification and resolution of such concerns, the policy helps prevent potential safeguarding risks from escalating, supports staff in maintaining appropriate professional boundaries, and protects them from possible misunderstandings or false allegations. It reflects the Trust's commitment to safeguarding children in line with the teachings of the Catholic faith, ensuring a safe, respectful, and nurturing environment across all academies within the Trust.

The policy should be read in conjunction with the **Staff Code of Conduct** which explicitly identifies behaviours which are not in line with our expectations as an organisation. Through creating an open culture of openness and honest with regards to concerns, we can identify behaviour that is not consistent with our standards and these can be addressed. We want to empower all staff to share any low-level concerns so that we can address unprofessional behaviour and support the individual to correct it at an early stage.

Early identification of concerns can also assist the school in identifying patterns or trends which may mean that additional staff training is needed. It may well be that the actions are unintentional, however, we must maintain a culture that 'it could happen here.'

DEFINITION OF A LOW-LEVEL CONCERN

The terminology “low-level concern” (LLC) is used to describe fairly minor safeguarding concerns or allegations. This choice of term is intended to help neutralise and encourage the act of sharing and reporting such concerns. LLCs may relate to physical, emotional or sexual behaviour.

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ that must be reported.

According to KCSIE 2024, A low-level concern refers to any behaviour by an adult working in or on behalf of a school or college that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the harm threshold or is not serious enough to refer to the local authority.

Examples include being overly friendly with children, having favourites, taking photographs of children on personal devices contrary to school policy, engaging with a child one-on-one in secluded areas, or using inappropriate language.

PROCEDURES IN SCHOOL FOR REPORTING LOW-LEVEL CONCERNS

We expect all schools within our Romero Catholic Academy Trust to follow the same procedures, whilst we recognise that each school has a different context, with Safeguarding it is important that we centralise all aspects of reporting, recording and monitoring.

Any member of staff, student parent or other person can make a low-level concern report and the process for doing this must be made available to staff and students alike.

Any concerns should be reported to the head teacher of the school, ideally using the proforma (appendix A) however, reports can be made verbally or via other means such as letter or email. In those cases it is the responsibility of the head teacher to record this appropriately including action taken and rationale for decision making.

Headteachers should always be informed about low-level concerns and should be the ultimate decision maker in respect of all low-level concerns. This is so that if there are patterns that other staff may not be aware of, it can be addressed by one recipient and ensure that no problematic or concerning behaviour is lost. However, it may be appropriate to delegate fact finding to a DSL, Deputy Headteacher or relevant Senior Member of Staff.

Headteachers should maintain an atmosphere of openness with the Trust Head of Safeguarding within the Central Team and seek to inform and/or ask if there are any concerns in relation to low-level concerns that they are unsure about. They do not need to divulge the name of the member of staff for whom the concern is about. If in doubt about whether it meets threshold or not, they should seek advice from the local authority designated officer (LADO).

If the concerns are related to the Headteacher then the Director for Primary/Secondary Education and the Chair of Governors should be contacted. They will liaise with the Head of Safeguarding and appropriate recording of the incident will take place as above.

If the concerns are related to a member of the Central Trust Team, then they must report to the Headteacher who will discuss with the Head of Safeguarding. Again, records of reports and appropriate action will be kept centrally.

PROCEDURES IN SCHOOL IF STAFF WISH TO REMAIN ANONYMOUS

If the member of staff who raises the concern does not wish to be named, then the organisation should respect that person's wishes as far as possible.

We would hope that our organisational culture is strong enough that staff do speak to the Headteacher in person and do not put in anonymous concerns about their colleagues. It is imperative that we recognise that safeguarding is everyone's responsibility and by creating a culture where staff are not afraid to share, we can ensure our code of conduct is constantly lived, monitored and reinforced by all staff.

There may be times when the member of staff who raised the concern will need to be named, and anonymity can never be promised.

IF STAFF WISH TO SELF-REPORT

Occasionally a member of staff may find themselves in a situation whereby they find themselves in a situation which may be misinterpreted.

The Romero Code of Conduct outlines how to minimise this risk through notifying the Headteacher in advance of any potentially compromising situations e.g., if a member of staff has a child in the school and their friends visit, where they have contact with families outside of school.

Members of staff may have behaved in a manner which, on reflection, they feel falls below the standard set out in Romero's Code of Conduct. We encourage self-reporting so that it enables a potentially difficult issue to be addressed at the earliest opportunity.

RESPONDING TO LOW-LEVEL CONCERNS

Headteachers should follow the flow chart at Appendix b when dealing with low-level concerns.

Low-level concerns will be managed promptly and proportionately by the headteacher to maintain a safe environment while supporting staff development. Where appropriate, guidance or training will be provided to address minor breaches of conduct and reinforce professional boundaries. If required, proportionate corrective action will be taken to prevent the recurrence of inappropriate behaviour.

Romero Catholic Academy Trust is committed to fostering a culture of openness and support while prioritizing child safeguarding. Staff will be treated fairly and with respect throughout the process, with a focus on encouraging self-reflection and professional growth. Any intervention will aim to address concerns constructively while maintaining the welfare and safety of children as the paramount concern

If support or advice is needed about low-level concerns, speak to either the Head of Safeguarding or Executive Director for Primary/Secondary.

The low-level concern might relate to disciplinary issues and be unrelated to

Safeguarding. Therefore, please discuss with the HR team at the Central Trust. At this point the Trust HR procedure will advise the next steps. In the case of a supply teacher or contractor, notify their employer.

If there are any patterns of behaviour and lessons not learnt, discuss with HR team. Be alert to periods of time in between low-level concerns and if there are any factors related to the wellbeing of the individual which may mean some behaviours are out of character. If in doubt, discuss with the Head of Safeguarding.

If it is determined that the behaviour a) in of itself may meet the harm threshold or b) when considered with any other low-level concerns that have previously been shared may have reached the harm thresholds, then it should be referred to the LADO. As in Central Trust Safeguarding and Child Protection Policy, also notify the Head of Safeguarding.

STORAGE AND RETENTION OF LOW LEVEL CONCERNS

Any low-level concern should be stored confidentially with only access afforded to a limited number of individuals i.e., Headteacher, DSL and the individual they report to.

They can be stored electronically or on a central file that should be accessible if, for example, the Headteacher was to move on.

If there are a number of low-level concerns for the same person, they should be held chronologically within their HR file to enable emerging patterns of behaviour over time.

Low-level concerns should be kept centrally within the low-level concerns file. This is so that we can identify, patterns, potential gaps in training or Safeguarding Practice, no names should be held on this file. See Appendix C

For low-level concerns KCSIE 2024 recommends in paragraph 447 that: It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment. At Romero Catholic Academy Trust, for the purpose of review we will retain for 12 months after an individual leaves the school or the Trust.

MONITORING AND REVIEWING

Regular reviews of low-level concerns will be held both by the school and centrally by the trust to identify any patterns that may indicate a more serious issue.

Following these reviews, the school will ensure that appropriate consideration is given to the their culture and whether or not it has enabled the inappropriate behaviour to occur. The Headteacher/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.

The governing body will be made aware of how low-level concerns are managed while maintaining confidentiality. This will be done through the LGB meetings. In addition trust wide management of low-level concerns will be reported to the trust board for oversight and review.

REFERENCES USED IN THE DEVELOPMENT OF THIS POLICY

1. Department for Education (DfE). (2024). Keeping children safe in education: Statutory guidance for schools and colleges. UK Government. Retrieved from <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

2. NSPCC. (2021). Responding to low-level concerns in education settings. National Society for the Prevention of Cruelty to Children. Retrieved from <https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education>
3. Department for Education (DfE). (2023). *Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children*. UK Government. Retrieved from <https://www.gov.uk/government/publications/working-together-to-safeguard-children>
4. Safer Recruitment Consortium. (2022). *Guidance for safer working practice for those working with children and young people in education settings*. Retrieved from <https://saferrecruitmentconsortium.org>
5. Catholic Education Service (CES). (2023). *Model Safeguarding and Child Protection Policy*. Retrieved from <https://www.catholiceducation.org.uk>
6. Farrer & Co., & NSPCC. (2022). *Developing and implementing a low-level concerns policy: A guide for organisations which work with children*. Retrieved from <https://www.farrer.co.uk>

Appendix A

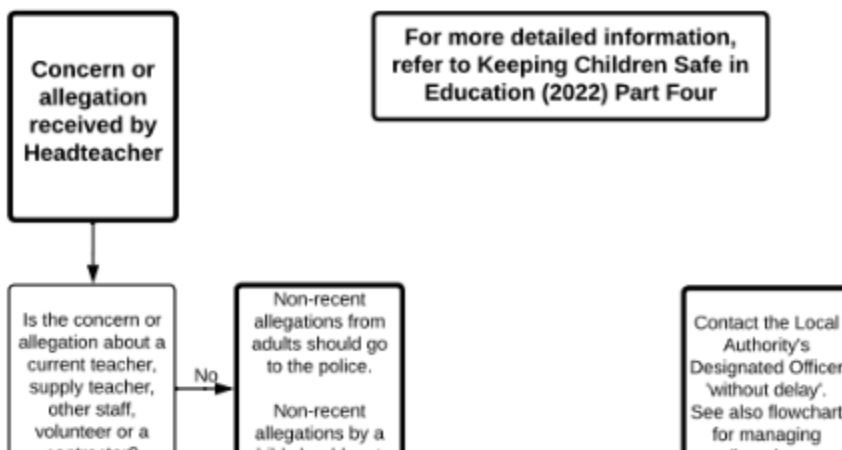
LOW LEVEL CONCERNS FORM

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

Signed:	Date and time:

This record will be held securely in accordance with Romero CAT's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Romero CAT may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



Appendix C

LOW LEVEL CONCERNS OVERVIEW

Keeping a record of the type of concerns with no personal data will allow for patterns and trends to be identified. Considering whether an individual or whole school approach is necessary to address the concerns. For example, if there were a number of concerns being raised about language used by

different staff towards or about students' school may want to look at whole school training on conduct.

Nature of the concerns	Date it was raised	Individual action	Whole school action

