Harehills Primary School



Reporting Low Level Concerns Policy

Approved by:	Judy Wood	**Policy Date:** September 2026	
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Reporting Low-Level Safeguarding Concerns Policy

1. Statement of intent

1.1. Harehills Primary School understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. While a concern may be low-level, that concern can escalate over time to become much more serious.

1.2. The aim of this policy is to contribute to embedding a safeguarding culture in which the clear values and expected behaviours (which are set out in our Code of Conduct) are lived, perceived, and constantly monitored by all staff.

1.3. Specifically, this means to:

• Creating a safe environment for pupils.

• Maintain a culture of openness, trust and transparency.

• Ensure that staff are confident and clear about expected behaviours of themselves and their colleagues, and reporting lines.

• Ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be understood as falling short of the standards set out in our Code of Conduct.

• Enable responsive, sensitive and proportionate handling of such concerns when they are raised.

• Maintain on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

2. What is a low-level concern, including those that are self-reports?

2.1. For the purposes of this policy, a "low-level concern" is defined as any concern had about an individual'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 an individual that is considered inappropriate in line with statutory safeguarding advice and Harehills Primary School's Code of Conduct. A low-level concern could be a concern, no matter how small and even if no more than a 'nagging doubt' including a sense of unease as to the individual's behaviour particularly towards or around children.

2.2. Low-level concerns are differentiated from allegations. "Allegations" are defined in this policy as accusations that an adult has:

2.2.1. behaved in a way that has harmed a child or may have harmed a child; and / or

2.2.2. possibly committed a criminal offence against, or related to, a child; and / or

2.2.3. behaved towards a child in a way that indicates they may pose a potential risk of harm to children; and / or

2.2.4. behaved or may have behaved in a way that indicates they may not be suitable to work with children (Keeping Children Safe in Education 2024, page 106 Section 2); and / or

2.2.5. there is a pattern of low-level concerns which collectively amount to an allegation; and / or

2.2.6. there is other information which, when considered, leads to an allegation.

2.3. While low-level concerns are, by their nature, less serious than allegations, Harehills Primary School understands that many serious safeguarding concerns (for example child sexual abuse), often begin with low-level concerns, such as subtle grooming by the offender. Harehills Primary School will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

3. Self-reporting Low level concerns about an adult

3.1. From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Where a staff member wishes to work outside of their contract with the school, they should first seek agreement with their Headteacher, and a written confirmation placed in their employee file.

3.2. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

3.3. As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

4. Low-level concerns about others

4.1. Harehills Primary 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.

4.2. From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

4.3. Harehills Primary School will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school / academy community, e.g. pupils are not treated as friends and an appropriate professional distance and approach is maintained by staff.

4.4. Harehills Primary 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. Harehills Primary 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.

5. What should I do if I have one?

5.1. Harehills Primary 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 to the Headteacher regardless of whether they relate to a fellow member of staff.

5.2. Where a low-level concern (including self-reports) exists: -

5.2.1. it should be reported to the Headteacher as soon as reasonably possible

and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

5.2.2. If there are concerns about the Headteacher then these should be reported to the Chair of Governors.

5.3. Staff members should report their concerns by submitting a Low-level Concern Reporting Form.

5.4. Staff members may request anonymity when reporting a concern, and Harehills Primary School will endeavour to respect this as far as possible. However, Harehills Primary School would encourage staff to feel comfortable about voicing any concerns openly. Completely anonymous disclosures are difficult to investigate. If a staff member wants to raise their concern confidentially, then Harehills Primary School will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concern. Staff will be protected from potential repercussions caused by reporting a genuine concern. However, if we conclude that a false allegation has been maliciously made, then the individual concerned may be subject to disciplinary action.

6. How will a low-level concern be handled (including self-report)?

6.1. The Headteacher will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure.

6.2. Where the Headteacher is in any doubt whatsoever, advice will be sought from the DSL. If necessary, this may be on a no-names basis.

7. Acting on concerns

7.1. Where it is determined that a concern is low-level, Harehills Primary School will respond in a sensitive and proportionate manner. The following procedure will be followed:

7.2. The Headteacher and DSL will hold a meeting with the individual about whom the concern was reported, during which they will:

7.3. Talk to the individual in a non-accusatory and sympathetic manner.

7.3.1. Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).

7.3.2. Clearly state what about their behaviour was inappropriate and problematic.

7.3.3. Discuss the reasons for the behaviour with the individual.

7.3.4. Inform the individual clearly what about their behaviour needs to change.

7.3.5. Discuss any support that the individual may require to achieve the proper standards of behaviour.

7.3.6. Allow the individual the opportunity to respond to the concern in their own words.

7.4. The headteacher will consider whether the individual should receive guidance, supervision or any further training.

7.5. Where considered appropriate in the circumstances, the Headteacher may 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.

7.6. 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.

7.7. 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.

7.8. 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, the concerns will be escalated.

7.9. Where the Headteacher decides 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.

8. What records will be kept?

8.1. Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a central file which logs all low-level concerns and will be retained until the staff member reaches normal pension age or 10 years after if longer. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

8.1.1. the concern (or group of concerns) has been reclassified as an allegation as above; or

8.1.2. the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

9. Monitoring and review

This policy will be reviewed annually by Harehills Primary School, and in response to any new safeguarding guidance or legislation.