

St Mary's Catholic Primary School and Nursery



Low-Level Safeguarding Concerns Policy 2025 - 26

Policy Leader / DSL / HT	Patrick Smyth
Deputy DSL	Jessica Nicklin
Safeguarding Governor / Chair of Governors	Andrew Jenner/ Matthew Simpson
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This policy applies to all 'low level' concerns about members of staff, including supply teachers, volunteers and contractors

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level safeguarding concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level safeguarding concerns

All concerns should be reported to the headteacher.

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as exemplified above in this policy with the headteacher (or the Chair of Governors, if the concern regards the headteacher)
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

- Helping to identify any weakness in the school's safeguarding system
- Refer to the schools values and what this represents in the workplace and school.
- Share information regularly with staff
- Safeguarding courses pre-employment if appropriate
- Item on staff induction (e.g. Guidance for Safer Working Practice)
- All staff are made aware that concerns are reported to headteacher
- Annual training

Responding to low-level safeguarding concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

In the event that the low level concern is in respect of the headteacher, then the process described above will be followed by the Chair of Governors.

Record keeping

All low-level concerns will be recorded in writing on CPOMS Staff Safe. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified. These will be recorded on CPOMS STAFF SAFE

References We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance Links to Other Policies Behaviour Policy Safeguarding Policy

Links to Other Policies and Documents

- Safeguarding Policy
- Code of Conduct
- Guidance for Safer Working Practice 2022

The Policy was reviewed in September 2025.

The Policy was approved by Governors in November 2025.