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Reporting Low-Level Safeguarding Concerns Policy

#SG11

**Last amended 1st September 2025**

**To be reviewed no later than December 31st 2026**

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**Common abbreviations and acronyms**

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| --- | --- | --- | --- |
| **AA** | Admissions Authority | **HASH** | Herefordshire Association of Secondary Heads |
| **AAI** | Adrenaline Auto-Injector (Epi Pen) | **HBV** | Honour Based Violence |
| **ACM** | Asbestos Containing Materials | **HR** | Human Resources |
| **AFH** | Academies Financial Handbook | **H&S** | Health and Safety |
| **AHT** | Assistant Headteacher | **HoS** | Head of School |
| **AIR** | Attendance Intervention Reviews | **HSE** | Health and Safety Executive |
| **APIs** | Application Programme Interfaces | **ICO** | Information Commissioners Office |
| **BAME** | Black, Asian and Minority Ethnic Backgrounds | **IHP** | Individual Healthcare Plan |
| **BCP** | Business Continuity Plan | **IRMS** | Information and Records Management Society |
| **BFR** | Budget Forecast Return | **IWF** | Internet Watch Foundation |
| **CAMHS** | Child and Adolescent Mental Health Services | **KCSIE** | Keeping Children Safe in Education |
| **CEO** | Chief Executive Officer | **KS1/2/3/4** | Key Stage 1/2/3/4 |
| **CFO** | Chief Financial Officer | **LAC** | Looked After Child |
| **CIF** | Condition Improvement Fund | **LADO** | Local Authority Designated Officer |
| **CIN** | Child in Need | **LGB** | Local Governing Body |
| **CLA** | Children Looked After | **LLC** | Low-Level Concerns |
| **CMIE** | Child Missing in Education | **LSA** | Learning Support Assistants |
| **COO** | Chief Operating Officer | **MASH** | Multi-Agency Safeguarding Hub |
| **COSHH** | Control and Substances Hazardous to Health | **MAT** | Multi-Academy Trust |
| **CP** | Child Protection | **MFA** | Multi-Factor Authentication |
| **CPD** | Continuing Professional Development | **MFL** | Modern Foreign Language |
| **CSCS** | Children’s Social Care Services | **NCSC’s** | National Cyber Security Centres |
| **CSE** | Child Sexual Exploitation | **NPQEL** | National Professional Qualification in Executive Leadership |
| **CTIRU** | Counter-Terrorism Internet Referral Unit | **PA** | Persistent Absence |
| **CWD** | Children with Disabilities | **PAN** | Published Admission Number |
| **DBS** | Disclosure and Barring Service | **PECR** | Privacy and Electronic Communications Regulations |
| **DDSL** | Deputy Designated Safeguarding Lead | **PEP** | Personal Education Plan |
| **DfE** | Department for Education | **PEEP** | Personal Emergency Evacuation Plan |
| **DHT** | Deputy Headteacher | **PEx** | Permanent Exclusion |
| **DSE** | Display Screen Equipment | **PLAC** | Previously Looked After Child |
| **DSL** | Designated Safeguarding Lead | **PP** | Pupil Premium |
| **DPO** | Data Protection Officer | **PSHE** | Personal, Social and Health Education |
| **EAL** | English as an Additional Language | **PSED** | Public Sector Equality Duty |
| **ECT** | Early Career Teacher | **PTFA** | Parent, Teacher and Friends Association |
| **EHA** | Early Help Assessment | **RIDDOR** | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations |
| **EHCNA** | Education, Health and Care Needs Assessment | **RHE** | Relationships and Health Education |
| **EHCP** | Education, Health and Care Plan | **RSHE** | Relationships, Sex and Health Education |
| **EHE** | Elective Home Education | **SALT** | Speech and Language Therapist |
| **ELSA** | Emotional, Literacy and Support Assistant | **SARC** | Sexual Assault Referral Centre |
| **ESFA** | Education and Skills Funding Agency | **SBM** | School Business Manager |
| **EVC** | Educational Visit Coordinator | **SCCs** | Standard Contractual Clauses |
| **EWO** | Education Welfare and Safeguarding Support Officer | **SDQ** | Strengths and Difficulties Questionnaire |
| **EYFS** | Early Years Foundation Stage | **SEMH** | Social, Emotional, and Mental Health |
| **FBV** | Fundamental British Values | **SENCO** | Special Educational Needs Coordinator |
| **FGM** | Female Genital Mutilation | **SEND** | Special Educational Needs and Disabilities |
| **FOI** | Freedom of Information | **SLA’s** | Service Level Agreements |
| **FSM** | Free School Meals | **STEM** | Science, Technology, Engineering and Maths |
| **FTS** | Find a Tender Service | **TA** | Teaching Assistant |
| **GAG** | General Annual Grant | **TCAT** | Three Counties Academy Trust |
| **GDPR** | General Data Protection Regulation | **VSH** | Virtual School Headteacher |
| **GIAS** | Get Information about Schools |  |  |
| **GPA** | Government Procurement Arrangement |  |  |

**Statement of intent**

Three Counties Academy Trust (TCAT) 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.

TCAT 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. TCAT 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.

**NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.**

# 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 (2024) ‘Working Together to Safeguard Children’

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

* Data Protection Policy (FI20)
* Whistleblowing Policy and Procedure (HR25)
* Staff Code of Conduct (HR26)
* Child Protection and Safeguarding Policy and Procedures (SG1)
* Allegations of Abuse Against Staff Policy (SG5)
* Physical Intervention Policy (SG7)
* Professional Boundaries with Pupils Policy (SG12)

Central TCAT policies have the policy number identified, e.g. “SG1”. Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school’s website.

# 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. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the TCAT Staff Code of Conduct, and the appropriate and inappropriate behaviour subsection of this policy.

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 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 in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, TCAT understands that many serious safeguarding concerns, e.g., child sexual abuse, often begin with low-level concerns, e.g., being overly friendly with children.

TCAT will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

# Roles and responsibilities

The Trust Board and Local Governing Bodies have a duty to:

* Ensuring that TCAT and each 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 DSL’s 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 Executive Headteacher/CEO in consultation with the Trust Education Welfare and Safeguarding Support Officer is responsible for:

* Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level
* In consultation with the DSL and the Headteacher/Head of School, 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 TCAT, 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

Each DSL is responsible for:

* Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level
* In consultation with the Executive Headteacher/CEO, Trust Education Welfare and Safeguarding Support Officer and the Headteacher/Head of School, 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 Executive Headteacher/CEO, Trust Education Welfare and Safeguarding Support Officer, Headteacher/Head of School, staff members, the Trust Board and Local Governing Body where delegated, and all relevant agencies to act upon concerns, where necessary
* In collaboration with the Headteacher/Head of School, 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

The Headteacher/Head of School is responsible for:

* In collaboration with the school DSL, keeping detailed, accurate and secure records of all low-level concerns and any actions taken
* Sharing these concerns with the Executive Headteacher/CEO, Trust Education Welfare and Safeguarding Support Officer and their DSL
* Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level
* Implementing this policy, and all related policies throughout their 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

Staff are 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

# Prevention amongst staff

**Appropriate and inappropriate behaviour**

TCAT 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 a TCAT 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 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:

* **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 or volunteers 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 TCAT Staff Code of Conduct. The Executive Headteacher/CEO and the Trust Education Welfare and Safeguarding Support Officer 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.

**TCAT school culture**

TCAT 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.

We 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 TCAT Staff Code of Conduct and the Professional Boundaries with Pupils Policy.

Staff will address any questions they have regarding safeguarding to the DSL in their school. TCAT will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the TCAT community, e.g., pupils are not treated as friends and an appropriate professional distance is maintained by staff.

TCAT 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. We 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 TCAT school culture following concerns**

Additionally, we will ensure that appropriate consideration is given to TCAT’s culture and whether or not it has enabled the inappropriate behaviour to occur. The Executive Headteacher/CEO and Trust Education Welfare and Safeguarding Support Officer will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the TCAT culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

# Reporting concerns

TCAT 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 their DSL, who in turn will alert the Executive Headteacher/CEO, Trust Education Welfare and Safeguarding Support Officer and Headteacher/Head of School immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy and Procedures. 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 their DSL verbally, or by submitting a Low-Level Concern Reporting Form. When submitting concerns, staff will take care to ensure that they observe 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 TCAT will endeavour to respect this as far as possible. TCAT 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 Executive Headteacher/CEO, it should be reported to the Chair of the Trust Board.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work within TCAT, staff will also be required to report this to their DSL who will inform the Executive Headteacher/CEO and the Trust Education Welfare and Safeguarding Support Officer, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to a DSL will be documented in line with the Records Management Policy.

In line with the evaluating concerns section of this policy, if a school receives an allegation of a low-level safeguarding concern regarding an organisation that has hired the school premises, TCAT and the school will follow its usual safeguarding procedures and process for managing allegations.

# 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 TCAT Staff Code of Conduct or violates the Professional Boundaries with Pupils Policy

We 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 Executive Headteacher/CEO, Trust Education Welfare and Safeguarding Support Officer, Headteacher/Head of School and DSLs 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.

# Evaluating concerns

Where the Headteacher/Head of School is notified of a safeguarding concern, with the input of the Trust Education Welfare and Safeguarding Support Officer, DSL, and Executive Headteacher/CEO, 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/Head of School will discuss the concern with their DSL and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, leaders will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy and Procedures, at all times.

To evaluate a concern, the Headteacher/Head of School in discussion with the Executive Headteacher/CEO, Trust Education Welfare and Safeguarding Support Officer, and DSL will:

* Request to speak to the individual who raised the concern with their consent 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 TCAT 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 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

# 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 TCAT Staff Code of Conduct, the Professional Boundaries with Pupils Policy and the law, the Headteacher/Head of School 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/Head of School 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/Head of School 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/Head of School will discuss the concern with their DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in TCAT’s policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL, Trust Education Welfare and Safeguarding Support Officer, Headteacher/Head of School and Executive Headteacher/CEO will work together to resolve this with input from other staff members, as necessary.

**Where the concern is low-level**

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

* The Headteacher/Head of School 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
	+ 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 Headteacher/Head of School asks the individual to re-read the TCAT Staff Code of Conduct and/or the Professional Boundaries with Pupils Policy, depending on the nature of the concern
* The Headteacher/Head of School will consider whether the individual should receive guidance, supervision, or any further training
* Where considered appropriate in the circumstances, the Headteacher/Head of School 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/Head of School 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/Head of School 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. Such records are to be audited regularly by the Trust Education Welfare and Safeguarding Support Officer so that a clear separation of duty is in place and the integrity of the system is paramount.

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 Executive Headteacher/CEO in consultation with the Trust Education Welfare and Safeguarding Support Officer and the Headteacher/Head of School 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 Executive Headteacher/CEO will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

# Record keeping

Each TCAT school will retain all records of low-level concerns, including those that were found to be unfounded. The Headteacher/Head of School will ensure that all records include the most accurate and up-to-date information and will store them in a locked folder within their office. The Headteacher/Head of School 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. Where the Headteacher/Head of School delegates the storage and maintain of low-level concern records, this can only be to their DSL.

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 rationale for decisions made regarding any concerns

The DSL and the Trust Education Welfare and Safeguarding Support Officer will periodically review the recent low-level concerns made, at least each half-term, 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 and Trust Education Welfare and Safeguarding Support Officer will keep records of these reviews separate to the reports held within the Headteacher/Head of School’s office or where delegated the DSLs office.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with their Headteacher/Head of School to decide on a course of action. Where the concerning pattern relates to the Headteacher/Head of School the DSL will consult the Executive Headteacher/CEO, and where the concerning pattern relates to the Executive Headteacher/CEO, the DSL will consult the Trust Education Welfare and Safeguarding Support Officer. 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 who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, 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 Trust Education Welfare and Safeguarding Support Officer will ensure that all records are kept in a manner that is consistent with the Data Protection Policy by instructing DSLs on procedure during audits. Records will be confidential and securely destroyed no earlier than 12 months after the staff member to whom the concerns pertain has left TCAT.

TCAT 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. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

# Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 31st December 2026.

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| Signed by: |
|  | Executive Headteacher/CEO | Date: |  |
|  | Board appointed Trustee | Date: |  |

**Appendix A**



**Low-Level Concern Reporting Form**

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to your Headteacher/Head of School or in the case of the concern relating to the Headteacher/Head of School return to the Executive Headteacher/CEO. Please refrain from discussing this concern with anyone other than the Executive Headteacher/CEO, Headteacher/Head of School, Trust Education Welfare and Safeguarding Support Officer 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 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 Staff Code of Conduct? |
| **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 Executive Headteacher/CEO, Headteacher/Head of School, Trust Education Welfare and Safeguarding Support Officer or 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** |  |
| **For use by safeguarding team upon receipt of concern** |
| **Date and time concern received** |  |
| **Signature of DSL, deputy DSL or Trust Education Welfare and Safeguarding Support Officer** |  |
| **Actions to be taken,** e.g., no action, investigation, reclassification as allegation meeting the harms threshold. |  |
| **Rationale for deciding on actions above.** |  |