

Three Counties Academy Trust



Reporting Low-Level Safeguarding Concerns Policy

#SG11

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Policy Abbreviations and Acronyms

CEO	Chief Executive Officer
DfE	Department for Education
DSL	Designated Safeguarding Lead
LADO	Local Authority Designated Officer
ICO	Information Commissioner's Office
TCAT	Three Counties Academy Trust
UK GDPR	United Kingdom General Data Protection Regulation

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

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.

Member, Trustee, Local Governor and Staff Summary

Purpose of the Policy

- Ensure all safeguarding concerns about staff behaviour are recognised, recorded and acted upon before they escalate
- Promote a culture where safeguarding concerns are reported regardless of perceived severity
- Protect pupils through clear professional boundaries and early intervention

Governance Responsibilities

- Ensure safeguarding arrangements, policies and training remain effective and compliant
- Ensure appropriate reporting systems and investigation processes are in place
- Provide strategic assurance that concerns are managed appropriately
- Ensure suitably trained Designated Safeguarding Leads are in place

Key Definitions

- Low-level concerns are concerns about adult behaviour that do not currently meet the harms threshold
- Patterns of low-level concerns may indicate wider safeguarding risks and require escalation
- The harms threshold applies when behaviour may have harmed a child, indicates risk of harm or raises suitability concerns

Staff Expectations

- Adhere to the Staff Code of Conduct and Professional Boundaries with Pupils Policy
- Report concerns about pupils or colleagues immediately
- Maintain professional relationships and avoid behaviour that may be misinterpreted
- Recognise that safeguarding is everyone's responsibility

Examples of Reportable Low-Level Concerns

- Being overly friendly with children
- Having favourites

- Taking photographs on personal devices
- One-to-one contact in secluded locations without appropriate safeguards
- Using inappropriate, intimidating or sexualised language

Reporting and Self-Reporting

- Concerns should be reported without delay through the DSL
- Staff may use the reporting form or report verbally
- Staff are encouraged to self-report behaviour that could be misinterpreted
- Whistleblowers raising genuine concerns will be protected

Managing Concerns

- Concerns are assessed to determine whether they are low-level or meet the allegations threshold
- Investigations must be proportionate, fair and evidence based
- Support, guidance and additional training may be provided where appropriate
- Repeated concerns may result in escalation to formal safeguarding procedures

Record Keeping and Assurance

- All concerns and outcomes must be recorded accurately and securely
- Records are regularly reviewed for emerging patterns
- Governance should seek assurance that low-level concerns are identified, monitored and acted upon
- Robust record keeping supports safeguarding culture and accountability

Parent Summary

Our Commitment to Safeguarding

- TCAT encourages staff to report concerns about adult behaviour at an early stage so that children remain safe
- Concerns are taken seriously and assessed appropriately
- A strong safeguarding culture helps prevent issues from escalating

What This Means for Parents

- The Trust has clear procedures for identifying, reporting and reviewing concerns about adult behaviour
- Concerns may range from conduct that requires advice and support through to matters requiring formal safeguarding action
- Schools work closely with safeguarding leaders and, where necessary, external agencies

Confidentiality and Fairness

- Parents are not entitled to details of safeguarding concerns involving members of staff or other individuals
- Parents will not normally be informed of the outcome of reports, investigations or employment matters
- Confidentiality protects children, staff and the integrity of safeguarding processes
- All concerns are considered fairly, proportionately and in line with safeguarding requirements

Reassurance for Families

- Concerns are reviewed by trained safeguarding professionals, which may include where appropriate the Local Authority Designated Officer (LADO)
- Records are maintained securely and monitored appropriately
- Where a concern indicates a greater risk to children, the matter is escalated through formal safeguarding procedures
- The welfare of children remains the priority throughout

If You Have a Safeguarding Concern

- Raise concerns with the school DSL, Headteacher or Head of School as soon as possible
- The school will ensure concerns are directed through the appropriate safeguarding process and handled sensitively

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance and good practice including, but not limited to, the following:

- [The Data Protection Act 2018](#)
- [The UK General Data Protection Regulation \(UK GDPR\)](#)
- [The Freedom of Information Act 2000](#)
- [DfE 'Keeping children safe in education'](#)
- [DfE 'Data protection in schools'](#)

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.

2. 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.

3. 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 CEO 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 Executive Headteacher, Headteacher or 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
- Updating 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

Executive Headteachers, Headteachers, and, where delegated, Heads of School in consultation with the Trust Education Welfare and Safeguarding Support Officer are responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level
- In consultation with the CEO and DSL, assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession
- Ensuring that all their staff have an ongoing awareness of low-level concerns and reporting procedures, and have undertaken safeguarding training
- In collaboration with the school DSL, keeping detailed, accurate and secure records of all low-level concerns and any actions taken
- Implementing this policy, and all related policies throughout their school, and ensuring that staff adhere to it at all times

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 their Executive Headteacher, Headteacher or, where delegated, Head of School, and the CEO, 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 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 their 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

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

4. 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 CEO, Headteacher/Head of School, DSL 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 CEO in consultation with Headteachers/heads of School, DSL's and the 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.

5. 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 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 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 CEO, their Headteacher/Head of School 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.

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 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 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.

7. 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 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 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

8. 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 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 following consultation with the CEO
- 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 CEO in consultation with the Trust Education Welfare and Safeguarding Support Officer, DSL 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 CEO will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy as case manager.

9. 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 CEO, and where the concerning pattern relates to the CEO, the DSL will consult the Trust Education Welfare and Safeguarding Support Officer and Chair of the Trust Board. 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

Lifespan of Policy: 3 Years

At any point this policy is updated or fully reviewed, it will be updated on the main TCAT website and will automatically update on all TCAT school websites simultaneously.

Where an annual check or other check results in minor changes, the Version History will be reviewed and updated with a change in the number following the decimal point, for example, v1.1 ⇒ v1.2. Where the policy is reviewed in full, then the number before the decimal point will change and reset, for example v1.4 ⇒ v2.0.

Any changes made by the CEO in collaboration with the Board Appointed Trustee will be passed to the Trust Board for ratification and subsequently be notified to Clerks to Local Governing Bodies and Headteachers/Heads of School.

The next scheduled full review date for this policy is 31st August 2029.

Date approved by the Board Appointed Trustee: 7th August 2026.

To be ratified and recorded in the minutes at the first Trust Board Meeting after 7th August 2026.

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 CEO. Please refrain from discussing this concern with anyone other than the CEO, Executive Headteacher, Headteacher or Head of School as appropriate, 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 CEO, Executive Headteacher, Headteacher or Head of School as appropriate, Trust Education Welfare and Safeguarding	Yes	No

Support Officer or DSL to discuss your concern? Please circle as appropriate.		
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.		

Trust Glossary

AA	Admissions Authority	H&S	Health and Safety
AAI	Adrenaline Auto-Injector (Epi Pen)	HoS	Head of School
ACM	Asbestos Containing Materials	HSE	Health and Safety Executive
AHT	Assistant Headteacher	ICO	Information Commissioners Office
AIR	Attendance Intervention Reviews	IDSR	Inspection Data Summary Report
APDR	Assess Plan Do Review Cycle	IHP	Individual Healthcare Plan
APIs	Application Programming Interfaces	IRMS	Information and Records Management Society
ASC	Autistic Spectrum Condition	IWF	Internet Watch Foundation
ASP	Analyse School Performance	KCSIE	Keeping Children Safe in Education
ATH	Academy Trust Handbook	KS1/2/3/4	Key Stage 1/2/3/4
BAME	Black, Asian and Minority Ethnic Backgrounds	LAC	Looked After Child
BAT	Board Appointed Trustee	LADO	Local Authority Designated Officer
BCP	Business Continuity Plan	LGB	Local Governing Body
BFR	Budget Forecast Return	LLC	Low-Level Concerns
CEO	Chief Executive Officer	LSA	Learning Support Assistants
CFO	Chief Financial Officer	MASH	Multi-Agency Safeguarding Hub
CIF	Condition Improvement Fund	MAT	Multi-Academy Trust

CIN	Child in Need	MFA	Multi-Factor Authentication
CLA	Children Looked After	MFL	Modern Foreign Language
CMIE	Child Missing in Education	NCSC	National Cyber Security Centre
COO	Chief Operating Officer	NoV	Note of Visit
COSHH	Control of Substances Hazardous to Health	NPQ	National Professional Qualifications
CP	Child Protection	PA	Persistent Absence
CPD	Continuing Professional Development	PAN	Published Admission Number
CPOMS	Child Protection Online Management System	PECR	Privacy and Electronic Communications Regulations
CSCS	Children's Social Care Services	PEP	Personal Education Plan
CSE	Child Sexual Exploitation	PEEP	Personal Emergency Evacuation Plan
CTIRU	Counter-Terrorism Internet Referral Unit	PEx	Permanent Exclusion
CWD	Children with Disabilities	PP	Pupil Premium
CYPMHS	Children and Young People's Mental Health Services	PPG	Pupil Premium Grant
DBS	Disclosure and Barring Service	PSHE	Personal, Social and Health Education
DDSL	Deputy Designated Safeguarding Lead	PSED	Public Sector Equality Duty
DfE	Department for Education	PTFA	Parent, Teacher and Friends Association
DHT	Deputy Headteacher	QA	Quality Assurance

DSE	Display Screen Equipment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
DSL	Designated Safeguarding Lead	RHE	Relationships and Health Education
DPO	Data Protection Officer	RPA	Risk Protection Arrangement
EAL	English as an Additional Language	RSHE	Relationships, Sex and Health Education
ECT	Early Career Teacher	SA	Severely Absent
EDIB	Equality, Diversity, Inclusion and Belonging	SALT	Speech and Language Therapist
EHA	Early Help Assessment	SARC	Sexual Assault Referral Centre
EHENA	Education, Health and Care Needs Assessment	SBM	School Business Manager
EHCP	Education, Health and Care Plan	SCC	Standard Contractual Clause
EHE	Elective Home Education	SCITT	School-Centred Initial Teacher Training
ELSA	Emotional Literacy Support Assistant	SCR	Single Central Record
ESFA	Education and Skills Funding Agency	SDP	School Development Plan
EVC	Educational Visit Coordinator	SDQ	Strengths and Difficulties Questionnaire
EWOSSE	Education Welfare and Safeguarding Support Officer	SEF	Self-Evaluation Form
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FFT	Fischer Family Trust	SEND	Special Educational Needs and Disabilities

FGM	Female Genital Mutilation	SIP	School Improvement Partner
FGMPO	FGM Protection Order	SLA	Service Level Agreement
FOI	Freedom of Information	SLCN	Speech, Language and Communication Needs
FSM	Free School Meals	SLT	Senior Leadership Team
FTS	Find a Tender Service	SPOC	Single Point of Contact
GAG	General Annual Grant	STEM	Science, Technology, Engineering and Maths
GDPR	General Data Protection Regulation	TA	Teaching Assistant
GIAS	Get Information about Schools	TAC	Team Around the Child
HASH	Herefordshire Association of Secondary Heads	TCAT	Three Counties Academy Trust
HBA	Honour Based Abuse	TUPE	Transfer of Undertakings (Protection of Employment)
HR	Human Resources	VSH	Virtual School Headteacher