



# TALBOT HEATH SCHOOL “Honour Before Honours”

## LOW-LEVEL CONCERNS POLICY: WHOLE SCHOOL, INC. EYFS

**Date adopted:** 1<sup>st</sup> September 2025

**Date for next adoption:** Autumn Term 2026

**Reviewed by:** FGB Committee

***As a school, we will make reasonable adjustments to this policy, in line with the SEND Code of Practice (2014) and the Equality Act (2010), for students with SEND.***

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the Head Teacher of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult’s suitability to work with or have access to children. All references in this section to “adult” should be interpreted as meaning any adult especially a member of staff, agency staff, governor and visitor, unless otherwise stated. The school is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

### **Code of Conduct**

In accordance with Talbot Heath’s Code of Conduct, all staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our ‘Staff Code of Conduct including ICT Mobile Equipment & Digital Citizenship Whole School Policy. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

In accordance with the ICT Mobile Equipment & Digital Citizenship Whole School Policy the school does not permit the use of personal mobile phones and cameras by staff where children are present. The school has a specific Early Years Policy for The Use of Mobile Phones and Devices that recognises and manages the risks by a means appropriate to the setting.

### **Our Low-Level Concerns Policy (including self-reporting)**

The overarching aim of the school’s Low-Level Concerns Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, and can distinguish between these and inappropriate, problematic or concerning behaviour in themselves and others.
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining 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.

### **What is a Low-Level Concern?**

A Low-Level Concern for this purpose is any concern, no matter how small and even if no more than a “nagging doubt”, that an adult may have acted in a manner inconsistent with the school's Code of Conduct, including inappropriate conduct outside of work, or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

From time to time one may notice a behaviour or actions in others (or oneself, see below) which leaves one concerned. These are behaviours 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.

Early identification and prompt management of all concerns about the behaviours of adults who work or volunteer with children is critical to effective safeguarding.

Everyone is required to share Low Level Concerns in this way:

- To ensure that there is a formalised mechanism for reporting Low Level Concerns;
- To allow staff to self-report to the school to protect themselves in situations where they may have felt themselves compromised;
- To identify concerning patterns of behaviour;
- To ensure that the school continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

Any such matters can be dealt with under our Low-Level Concerns Policy.

### **Reporting Low-Level Concerns**

Staff should

- **Report any behaviour by another adult** towards a pupil or another child that has concerned them.
- **Self-report** any situation in which they feel their behaviour towards a pupil or child could be misinterpreted or misconstrued leaving them vulnerable.

### **Reporting Low-Level Concerns regarding behaviour of another adult to a child**

A Low-Level Concern should be reported when a member of staff is concerned about the behaviour of another adult towards a pupil or another child. This is not just where it is clear that a professional boundary has been broken: anything which causes staff to have a ‘nagging doubt’ about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their personal devices.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

### **What are Self-Reports of Low-Level Concerns?**

Self-reporting is about reporting one's own behaviour.

From time to time one may find oneself in a situation which might appear compromising to others or which could be misconstrued. Equally, one may for whatever reason have behaved in a manner which on reflection one considers falls below the standard set out in the Code of Conduct.

Self-reporting demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of Low-Level Concerns as an important means of maintaining a beneficial culture.

### **Reporting Low-level Concerns?**

Where a Low-Level Concern (including self-reports) exists, it should be reported to the Head Teacher in the first instance, or the DSL in the Head Teacher's absence. This concern should be reported 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).

### **How will my Low-Level Concern be handled (including self-report)?**

The Head Teacher will;

- Speak with the person who has raised the Low-Level Concern
- Review the information and determine whether the behaviour is in line with the school's Code of Conduct.
- Determine that it is a Low-Level Concern and should not be reclassified as an *allegation* and dealt with under the appropriate procedure (outlined in safeguarding policy)

The circumstances in which a Low-Level Concern might be reclassified as an allegation are where:

- a) the harm threshold is met for an allegation
- b) there is a pattern of Low-Level Concerns which collectively amount to an allegation; or
- c) there is other information which, when considered, leads to an allegation.

- Where the Head Teacher is in any doubt whatsoever, advice will be sought from the Local Authority Designated Officer (LADO), if necessary, on a no-names basis;
- Speak to any witnesses (unless advised not to by the LADO/ and or external agencies);
- Speak to the individual about who the low-level concern has been raised (unless advised not to by the LADO/ and or external agencies);
- The Head Teacher will keep appropriate and detailed records of all internal and external conversations regarding the concern, rationale for their decision and any actions taken.

Most Low-Level Concerns, by their very nature, are likely to be minor and will be dealt with by means of management guidance, or training. The person to whom the Low-Level Concern relates should be informed of any concern raised about them, once all risk has been identified and assessed.

### **What records will be kept?**

All Low-Level Concerns (even those which turn out to be of no concern) will be recorded. The record will set out the details of the concern, the context in which the concern arose and the action taken. The name of the individual raising the concern will also be recorded, if the individual wishes to remain anonymous this should be respected as far as possible. Records will be stored securely.

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 password protected central file which logs all Low-Level Concerns and will be retained until the staff member reaches normal pension age or for a period of 10 years from the date of the allegation if that is 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:

- a) the concern (or group of concerns) has been reclassified as an allegation (meets the harm threshold) as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

### **Reviewing Low-level Concerns**

The Head Teacher will review the central Low-Level Concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any patterns of concerning or inappropriate behaviour are identified. A record of these reviews will be kept.