COTTESMORE SCHOOL

Low Level Concerns Policy

This Policy relates to the whole school including the Early Years Foundation Stage and is reviewed annually to ensure compliance with current regulations and law and must be read in conjunction with our Child Protection and Safeguarding Policy and other relevant Cottesmore School policies.

Created by	**Lottie Rogerson**
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Reviewed	**August 2026 (by David Revill)**
Review date	**August 2027**

Purpose

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Child Protection and Safeguarding policy are lived, monitored, and reinforced.

The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

Who does the policy apply to?

This policy applies to all staff and other individuals who work or volunteer in school.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school's Staff Behaviour and Code of Conduct, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:
- being over 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; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school's Staff Behaviour and Code of Conduct), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the headmaster. However, it is never too late to share a low-level concern if this has not already happened.

Where the headmaster is not available, the information will be reported to the designated safeguarding lead (or deputy), i.e. the most senior member of SMT acting in this role.

Low-level concerns about the Designated Safeguarding Lead will be reported to the headmaster and those about the headmaster will be reported to the Chair of Governance Advisors.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the headmaster of the details as soon as possible.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the headmaster a record of the conversation will be made by the headmaster which will be signed, timed, and dated.

All staff may ask to see content that relates to them and to make any reasonable objection to its contents.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The headmaster will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the West Sussex Safeguarding Hub or police (HR advice via the Bursar may also need to be taken)

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Disciplinary Procedure.
- is serious enough to consult with or refer to the WSCC: a referral should be made to the WSCC and HR advice taken via the Bursar.

Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the WSCC or Police: a referral should be made to the WSCC and HR advice taken from the Bursar. In this case the school's Staff Behaviour and Code of Contact within the Child Protection and Safeguarding Policy and Disciplinary Policy will be followed

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the WSCC
- the decision and the rationale for it
- any action taken.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Behaviour and Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the Staff Behaviour and Code of Conduct

Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour and Code of Conduct.

Should the low-level concerns file be reviewed?

Low-level concerns are routinely analysed for patterns. Whenever a new low-level concern is added, they are reviewed again, so that patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the WSCC if required.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the WSCC and found to be substantiated.

What is the role of the Governance Advisors?

The headmaster will regularly inform the Governance Advisors about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The DSL also updates the Safeguarding governance advisor about low-level concerns, when having their regular safeguarding discussions. The safeguarding governance advisor may also review an anonymised sample to ensure that these concerns have been handled appropriately.