



ANNETTE MACONOCHE

Head Teacher

Steve Thurlow

Chair of Governors

Telephone: 01263 820 520

Fax: 01263 820 521

Email: office@sheringhamwoodfields.norfolk.sch.uk

Website: www.sheringhamwoodfields.norfolk.sch.uk

Registered Charity: Friends of Sheringham Woodfields School - 1127142

Reporting Low-Level Safeguarding Concerns Policy

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Reporting Low-level Safeguarding Concerns Policy

Contents:

Statement of intent

1. Legal framework
2. Definitions
3. Roles and responsibilities
4. Prevention amongst staff
5. Reporting concerns
6. Self-reporting
7. Evaluating concerns
8. Acting on concerns
9. Record keeping
10. Monitoring and review
11. Low-level Concern Reporting Form

Appendices

Appendix One - Contact information for the Education Quality Assurance and Intervention Team

Appendix Two - Allegations made against school staff guidance.

Statement of intent

Sheringham Woodfields School 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 if not addressed and can become much more serious.

Our school prides itself on creating a safe and empowering environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school 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. We also wish to ensure that poor practice is addressed to support colleagues with maintaining high standards of professionalism.

At Sheringham Woodfields School the following staff can investigate low level concerns, and where possible the most appropriate person is chosen each time:

Annette Maconochie	Head Teacher
Michael Smith	Deputy Head and Safeguarding Lead / DSL
Matthew Smith	Business Manager and DSL
Rebecca Roach	Assistant Head Teacher and DSL
Nicola Stewart	Assistant Head Teacher / SENCo and DSL

1. 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'
- DfE (2023) 'Working Together to Safeguard Children'
- Guidance for Safer Working Practice for Adults who Work with Children and Young People

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Moving and Handling Policy
- Behaviour Management Policy
- Whistleblowing Policy
- Data Protection Policy

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 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, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious.

3. Roles and responsibilities

The governing board is responsible for:

- Ensuring that the 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 DSLs 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 Head Teacher is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- 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 the 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.

The SLT DSL's are responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- 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.
- If leading on a concern, liaising with the Head Teacher, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

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

The school 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 the 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 i.e. grooming. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported 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.** Contacting children outside of school hours (except when specifically arranged with Parents e.g providing respite)
- **Using inappropriate, sexualised, intimidating or offensive language.**
- **Using RPI (Restrictive Physical Intervention) in a way not approved by School i.e. not in line with Norfolk Steps Training.**

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 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 Staff Code of Conduct. The School 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.

School culture

The school 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.

The school 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 school's Code of Conduct.

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

The school 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. The school 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 school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Head Teacher and DSLs will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

5. Reporting concerns

The school 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 immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 3 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 the Head Teacher or member of SLT (all of whom are DSLs) verbally, or by submitting a Low-level Concern Reporting Form. When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and 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 the school will endeavor to respect this as far as possible. The school 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 Head Teacher, it should be reported to the Chair of Governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this via the agreed methods above. In turn, the school will inform the employer of the subject of the concern.

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

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 Staff Code of Conduct or violates another school policy such as Dignity, Respect and Confidentiality, Intimate Care or Behaviour Management.

The school 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 Head Teacher and DSL's 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 a safeguarding concern has been received, the Head Teacher or a member of SLT 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, those involved will discuss the concern with DSL's and seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the school will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the person assigned the concern will:

- Speak to the individual who raised the concern 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 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.
- Always 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.
- If it is not the Head Teacher leading on the concern, the said person will keep the Head Teacher up to date with regards to information linked to the concern.

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 Staff Code of Conduct, the Inappropriate Relationships with Pupils Policy and the law, the member of staff leading on this 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 member of staff leading on this will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The member of staff leading

on this 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 person leading on the concern will discuss their findings with the Head Teacher or other member of SLT to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL's and Head Teacher will work together to resolve this with input from other staff members, as necessary. Unfounded concerns cannot be referred to at a later date should subsequent concerns be submitted.

Where the concern is low-level

Where it is determined that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL 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 DSL asks the individual to re-read the Staff Code of Conduct and/or the 'Guidance for Safer Working Practice for Adults who Work with Children and Young People', depending on the nature of the concern.
- The DSL and the Head Teacher will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the Head Teacher 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 member of staff leading on the reported concern 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 (as part of the Data Protection Policy). The 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.

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

In consultation with the Head Teacher, the 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 school will then follow the procedures laid out in the Safeguarding Policy and/or Staff discipline Policy.

Please see Appendix One for how to take a Low Level Concern further.

9. Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Head Teacher will seek assurance that all records include the most accurate and up-to-date information and will store them in the electronic low-level concerns file. The Head Teacher will monitor 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.

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.

A DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. Records of these reviews will be kept via DSL meetings and / or SLT meetings (as all SLT are DSL's).

Where any concerning patterns of behaviour have been identified with regard to a member of staff, a DSL will consult with the Head Teacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the Duty Desk/LADO as soon as practicable for advice and support.

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 and any subsequent investigation(s).

The school will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The school 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. The Head Teacher provides the first reference on behalf of school and will have access to this information. External HR advice and support will be sought as required.

10. Monitoring and review

This policy will be reviewed annually by the Head Teacher and DSLs, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school.

11. Low-level Concern Reporting Form



Sheringham Woodfields School Low Level Concern

Please use this form to share any concern you might have – no matter how small, and even if no more than a 'doubt' – that an adult may have acted in a manner which:

- is not consistent with the Schools Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

You should provide a concise record using the form below – including brief context in which the low-level concern arose.

Please speak to a DSL should you need further help and support to complete this form.

Your name *

Your Email Address *

Date concern arose *

Member of staff/adult you are concerned about *

Detail the concern *

Your signature *

APPENDIX ONE

Seeking external advice/input with regards to a Low Level Concern

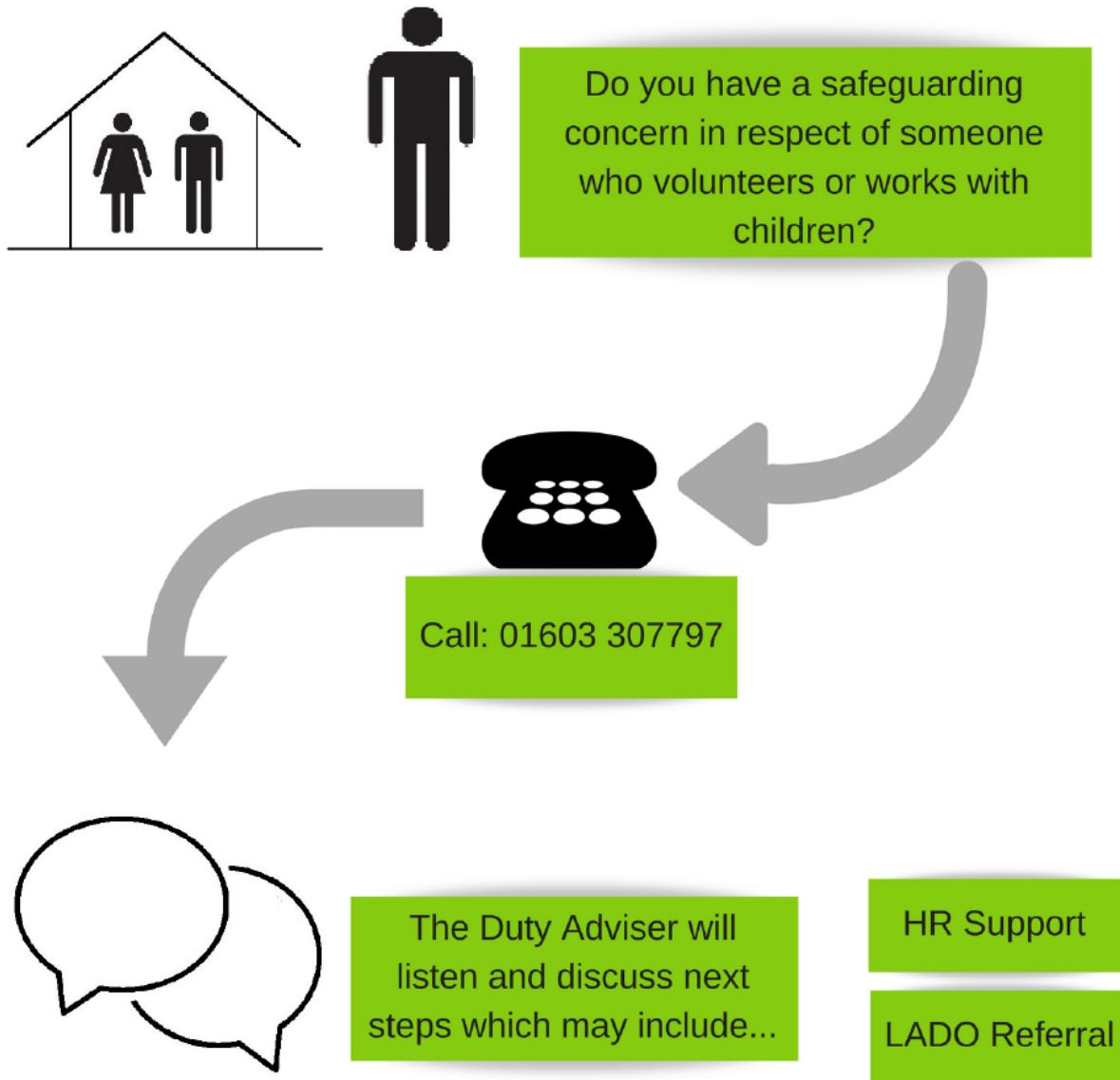


Norfolk County Council

Guidance for Schools, Colleges & Alternative Education Providers

Education Quality Assurance & Intervention Service

Duty Desk



APPENDIX TWO

Allegations made against school staff guidance

1. Introduction

- 1.1 The School has clear responsibilities for dealing with allegations of abuse of children made against their staff, whether those staff are paid or unpaid.
- 1.2 The statutory guidance entitled 'Keeping children safe in education' applies under Section 175 of the Education Act 2002, the Education (Independent School Standards (England) Regulations 2010 as amended by SI 2012/2962 and the Education (Non-Maintained Special schools) (England) Regulations 2011. The School must have regard to it when carrying out its duties to safeguard and promote the welfare of children. It should be read in conjunction with 'Working together to safeguard children'.

In addition, procedural guidance is outlined in the 'Norfolk Local Safeguarding Children's Board (NSCB) 'Allegations against persons who work with children' procedure. That procedure (section 8.3) gives guidance to the schools on how to comply with the 'Keeping children safe in education' document.

Where the school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) the school, as with any safeguarding allegation, should follow their safeguarding policies and procedures, including informing the LADO.

2. Procedure for handling allegations of abuse

- 2.1 The School should follow the Norfolk Local Safeguarding Board 'Allegations against persons who work with children' procedure (Section 8.3 of the NSCB policies and procedures manual on the NSCB website) when allegations or concerns of abuse are identified.

3. The Local Authority Designated Officer for Child Protection

- 3.1 The Local Authority Designated Officer (LADO) plays a key role in the process of dealing with allegations of abuse against staff.
- 3.2 The LADO for Norfolk schools can be contacted by telephone on 01603 307797.

The harm threshold and low-level concerns:

- 3.3 The harm threshold refers to allegations of abuse that may relate to a person who works/volunteers with children who has:
 - behaved in a way that has harmed a child, or may have harmed a child and/or;
 - possibly committed a criminal offence against or related to a child and/or;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Where allegations of abuse are made or safeguarding concerns are raised, which meet the harm threshold, the school should follow the procedure highlighted above in para 2.1

- 3.4 Safeguarding concerns that do not meet the harm threshold are considered 'low-level' concerns. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above at 3.3.
- 3.5 In Norfolk the 'low level' concern process is to consult with the Local Authority Education Duty Desk on 01603 307797. The School-should endeavour to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes clarifying when staff should self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Staff should report all low-level concerns to the Designated Safeguarding Lead (DSL) or to the Head Teacher. If reported to the DSL then the DSL should inform the Head Teacher of the concern in a timely fashion. The Head Teacher will always be the ultimate decision maker in respect of all low-level concerns
- 3.6 It is important to record low-level concerns and the actions taken in light of these being reported. Records relating to low-level concerns are confidential and should be stored securely. Records should be regularly reviewed to identify potential patterns and take action. Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.
- 3.7 Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

4. HR support

- 4.1 At appropriate stages in the process for dealing with allegations of abuse, support should be obtained from Education HR. Particularly during any internal investigation stage and, if there appears to be foundation to the allegations, through the disciplinary process, the school is strongly advised to involve Education HR to ensure that the various procedures are adhered to and that the rights of employees are recognised and met.