



**Swallow Grange**

## **Low-Level Concerns Policy**

**Policy Owner:** Proprietor

**Approved by:** Governing Body

**Review Frequency:** Annually

**Next Review Date:** June 2027

### **1. Policy Statement**

Swallow Grange is committed to creating and maintaining a culture of openness, transparency and safeguarding where the welfare of pupils is paramount. We recognise that sharing and responding appropriately to low-level concerns about adults working with children helps to identify patterns of behaviour, supports professional standards and protects both pupils and staff.

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy and the latest version of *Keeping Children Safe in Education (KCSIE)*.

### **2. Purpose**

The purpose of this policy is to:

- Promote a culture where concerns are shared promptly.
- Encourage staff to report concerns without fear of reprisal.
- Protect pupils from harm.
- Support staff in maintaining professional boundaries.
- Enable early intervention before concerns escalate.

### **3. Scope**

This policy applies to:

- Employees
- Agency staff
- Volunteers
- Governors
- Contractors
- Students on placement
- Anyone working on behalf of Swallow Grange

### **4. Definition of a Low-Level Concern**

A low-level concern is any concern—no matter how small—that an adult working in or on behalf of the school may have behaved in a way that:

- is inconsistent with the Staff Code of Conduct;
- may have caused a sense of unease, even if no immediate safeguarding risk is identified; or
- may not meet the threshold for referral to the Local Authority Designated Officer (LADO), but is still considered worthy of recording and reviewing.

Examples may include:

- being overly familiar with a pupil;
- using inappropriate language;
- failing to maintain professional boundaries;
- inappropriate use of mobile phones or social media;
- favouritism towards a pupil;
- being alone with a pupil without following school procedures;
- making inappropriate jokes or comments;
- minor breaches of the Staff Code of Conduct.

### **5. Reporting a Concern**

Any member of staff who has a low-level concern about another adult should report it as soon as possible to the Head of Provision.

Where the concern relates to the Head of Provision, it should be reported to the Proprietor.

Where the concern relates to the Proprietor, it should be reported to the Chair of Governors.

Reports may be made verbally initially but must be recorded in writing as soon as practicable.

## **6. Recording**

All low-level concerns will be:

- recorded promptly;
- stored securely and confidentially;
- reviewed to identify any emerging patterns;
- retained in accordance with data protection legislation and safeguarding guidance.

Records will include:

- date;
- person reporting;
- details of the concern;
- actions taken;
- outcome.

## **7. Responding to Low-Level Concerns**

The Head of Provision (or appropriate senior leader) will:

- speak with the individual concerned where appropriate;
- consider any explanation;
- assess whether the concern remains low level;
- identify whether further action is required;
- determine whether the concern should instead be managed under safeguarding or disciplinary procedures.

Where a concern meets the harm threshold, it will be managed in accordance with the school's Safeguarding Policy and referred to the Local Authority Designated Officer (LADO) where appropriate.

## **8. Confidentiality**

Low-level concerns will be handled sensitively and confidentially. Information will only be shared with those who need to know to fulfil safeguarding responsibilities.

## **9. Malicious or False Allegations**

Concerns should always be raised in good faith.

Knowingly false or malicious allegations may result in disciplinary action.

## **10. Training**

All staff will receive information about:

- professional boundaries;
- recognising low-level concerns;
- reporting procedures;
- safeguarding responsibilities;
- the Staff Code of Conduct.

Training will form part of induction and annual safeguarding updates.

## **11. Monitoring and Review**

The Proprietor and Governing Body will monitor the effectiveness of this policy through safeguarding oversight, staff training records and review of safeguarding procedures.

This policy will be reviewed annually or sooner if legislation or statutory guidance changes.

## **Related Policies**

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Safer Recruitment Policy
- Behaviour Policy
- Online Safety Policy
- KCSIE (current edition)