RHK Education

Low-level Safeguarding Concerns Policy

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Statement of intent

RHK Education_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.

RHK Education 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. RHK Education 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.

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 2025'
- DfE (2023) 'Working Together to Safeguard Children'

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Physical Intervention Policy
- Allegations of Abuse Against Staff 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.

The term 'low-level' concern does not mean that it is insignificant – a low-level concern is any concern that suggests an adult working in or on behalf of RHK Education may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work.
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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 allegations 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 or may have behaved in a way that indicates they may not be suitable to work with children.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, RHK Education understands that many serious safeguarding concerns often begin with low-level concerns, e.g. being overly friendly with children. RHK Education will

ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

3. Roles and responsibilities

The directors responsible for:

- Ensuring that RHK Education 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 of centre 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 RHK Education, 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 DSL 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.
- Following all procedures outlined in this policy for acting upon low-level concerns.
- Liaising with the head of centre, 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 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

RHK Education 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 RHK Education, 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, head of centre or other nominated person 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, but are not limited to:

- 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 contrary to RHK Education Policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils.

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 head of centre 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.

Provision culture

RHK Education 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.

RHK Education 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 Staff Code of Conduct and the Inappropriate Relationships with Pupils Policy.

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

RHK Education 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. RHK Education will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, 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

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

5. Reporting concerns

RHK Education 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 the head of centre, DSL, or deputy 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 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.

Where the DSL is informed of low-level concerns, they will inform the head of centre in a timely fashion according to the nature of the concerns. The head of centre will be the ultimate decision maker in respect of all low-level concerns; however, they may take a more collaborative approach with the DSL to make a decision.

Staff members will report their concerns to the head of centre 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 RHK Education will endeavour to respect this as far as possible. RHK Education 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 of centre, it should be reported to the eternal quality assurance consultant.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the centre, staff will also be required to report this to the head of centre, who will, in turn, inform the employer of the subject of the concern.

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

In line with the Evaluating concerns section of this policy, if the school receives an allegation of a low-level safeguarding concern regarding an organisation that has hired the premises, RHK Education 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 Staff Code of Conduct and professional boundaries with pupils procedures and guidelines.

RHK Education 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 of centre and DSL 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 head of centre is notified of a safeguarding concern, 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 head of centre will discuss the concern with the DSL and the deputy head of centre, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the head of centre 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 head of centre and DSL 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.
- 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 Staff Code of Conduct, the Inappropriate Relationships with Pupils Policy and the law, the head of centre 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 head of centre will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The head of centre 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 head of centre will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in RHK Education's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and head of centre will work together to resolve this with input from other staff members, as necessary.

If a concern has been raised via a third party, the head of centre will collect as much evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.

Where the concern is low-level

Where the head of centre determines that a concern is low-level, RHK Education 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 Inappropriate Relationships with Pupils Policy, depending on the nature of the concern.
- The DSL and the head of centre will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the head of centre 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 head of centre 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 head of centre 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

The head of centre 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 head of centre will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

9. Record keeping

RHK Education will retain all records of low-level concerns, including those that were found to be unfounded. The head of centre will ensure 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 of centre 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.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- 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 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. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the head of centre 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 LADO as soon as practicable. It should be considered whether there are any wider cultural issues within RHK Education that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

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 DSL 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 RHK Education.

In line with the Data Protection Policy, records will be kept confidentially and held securely to comply with the Data Protection Act 2018 and the UK GDPR. RHK Education will consider how long information needs to be retained; however, it will be retained at least until the individual leaves their employment.

RHK Education 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.

10. Monitoring and review

This policy will be reviewed annually by the head of centre and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in RHK Education. The next scheduled review for this policy is 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 the head of centre or DSL. Please refrain from discussing this concern with anyone other than the head of centre or DSL until the matter has been dealt with. We ask that you keep all details, including the name 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 head of centre and DSL to discuss your concern? Please circle as appropriate.	**Yes**	**No**
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 or deputy DSL		
Actions to be taken (e.g. no action, investigation, reclassification as allegation meeting the harms threshold.)		
Rationale for deciding on actions above		