

**THE ROCHE SCHOOL**  
**Low-Level Concerns Policy**

*This policy, which applies to the whole school, is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.*

**Document Details**

<b>Information Sharing Category</b>	Public Domain
<b>Version</b>	2
<b>Date Published</b>	October 2025
<b>Last Reviewed</b>	October 2025
<b>Next Review</b>	October 2026
<b>Authorised by (if required)</b>	Charlotte Doherty
<b>Responsible Area</b>	Senior Leadership and James Roche

**Availability:** All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the Policies Register.

### **1. Policy Statement**

This policy forms part of the school's safeguarding framework and should be read alongside the School's Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy and Behaviour Policy.

The welfare of children is paramount. The school is committed to maintaining the highest possible standards of professional conduct and safeguarding practice.

This policy enables staff to share concerns about adults working in the school where behaviour may not meet expected professional standards but does not meet the threshold for referral to external agencies or formal allegations procedures.

The purpose of this policy is to:

- create a culture of openness and transparency
- enable early identification of concerning behaviour
- ensure concerns are recorded and responded to appropriately
- support staff to maintain safe professional boundaries
- help prevent escalation to more serious safeguarding issues.

Low-level concerns will be handled sensitively and proportionately.

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### **2. Scope**

This policy applies to all adults working with children at the school, including:

- teaching staff
- early years staff
- support staff

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- supply staff
  - volunteers
  - advisors / proprietors
  - contractors working on site.
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### **3. Definition of a Low-Level Concern**

A low-level concern is any concern about an adult's behaviour towards a pupil that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or require referral to the Local Authority Designated Officer (LADO).

Low-level concerns may arise from a single incident or a pattern of behaviour.

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### **4. Examples of Low-Level Concerns**

Examples might include, but are not limited to, behaviour that:

- appears overly friendly or familiar with pupils
- involves taking photographs of pupils on personal devices
- involves being alone with a pupil behind a closed door without justification
- uses inappropriate language or tone with pupils
- shows favouritism towards particular pupils
- involves unnecessary physical contact
- communicates with pupils via personal social media or messaging platforms
- disregards school safeguarding procedures.

These examples are not exhaustive.

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### **5. Reporting Low-Level Concerns**

All staff have a professional responsibility to report low-level concerns.

Concerns should be reported as soon as possible to:

- the Headteacher; or
- the Designated Safeguarding Lead (DSL).

If the concern relates to the Headteacher, it should be reported to the Proprietor or Chair of the Advisory Board.

Staff may report concerns verbally or in writing, but a written record will always be made.

Staff should not attempt to investigate concerns themselves.

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## **6. Self-Reporting**

Staff are encouraged to self-report where they believe their own behaviour may have been misinterpreted or could give rise to a concern.

Self-reporting is viewed positively as it demonstrates transparency and professionalism.

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## **7. Recording Low-Level Concerns**

All low-level concerns will be recorded in writing.

Records will include:

- the date of the concern
- details of the incident or behaviour
- the name of the individual involved
- actions taken.

Records will be stored securely and separately from personnel files unless they relate to disciplinary action.

Records will be retained in accordance with data protection and safeguarding guidance.

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

The Headteacher (or appropriate senior leader) will consider the concern and determine an appropriate response.

Possible responses may include:

- informal conversation with the individual concerned
- clarification of professional boundaries
- additional supervision or guidance
- further monitoring of behaviour
- referral to the school's disciplinary procedures where appropriate.

Where patterns of behaviour emerge, the concern may be escalated to a formal safeguarding allegation.

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## **9. Confidentiality**

Low-level concerns will be handled sensitively and with due regard for confidentiality.

Information will only be shared with those who need to know in order to safeguard pupils and manage staff conduct.

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## **10. Culture of Safeguarding**

*The Roche School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential*

The school aims to foster a safeguarding culture where:

- concerns can be raised without fear of blame
- staff understand professional boundaries
- safeguarding practice is continually strengthened.

Staff will receive safeguarding training and guidance on professional conduct as part of induction and ongoing professional development.

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### **11. Monitoring and Review**

The Headteacher will review records of low-level concerns periodically to identify patterns or systemic issues.

This policy will be reviewed annually or sooner if required by changes in safeguarding guidance or legislation.

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### **12. Linked Policies**

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Behaviour Policy
- Safer Recruitment Policy
- Data Protection Policy.