COLMERS SCHOOL
& SIXTH FORM COLLEGE

# Reporting Low Level Safeguarding Concerns Policy

## 2026 27

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| **Relevant legislation and guidance** | Keeping Children Safe in Education 2026; Working Together to Safeguard Children 2026; UK GDPR; Data Protection Act 2018; Data Use and Access Act 2025 |
| **Linked policies** | Child Protection and Safeguarding Policy; Staff Code of Conduct; Allegations of Abuse Against Staff Policy; Whistleblowing Policy |
| **Review frequency** | Annual |
| **Policy owner** | Headteacher and Designated Safeguarding Lead |
| **Approved by** | Governing Board |
| **Date approved** | September 2026 |
| **Next review date** | September 2027 |

## Purpose and scope

This policy explains how Colmers School and Sixth Form College identifies, reports, records and responds to low-level safeguarding concerns about adults working in or on behalf of the school. It applies to employees, supply staff, volunteers, contractors and governors. It should be read with the Child Protection and Safeguarding Policy, Staff Code of Conduct, Allegations of Abuse Against Staff Policy and Whistleblowing Policy.

## Legal and guidance framework

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Education Act 2002
- Children Act 1989 and Children Act 2004
- UK GDPR and Data Protection Act 2018, as amended by the Data Use and Access Act 2025
- Equality Act 2010

## What is a low level concern

A low-level concern is any concern, however small and even if no more than a sense of unease, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold for an allegation. “Low-level” describes the threshold, not the seriousness with which the school treats the information.

- being over-friendly with pupils or favouring particular pupils
- having favourites or engaging with a pupil one-to-one in a secluded area or behind a closed door without proper justification
- using humiliating, intimidating or inappropriate language
- taking photographs of pupils on a personal device
- engaging with pupils, current or recent, through personal social media or private messaging
- behaviour outside work that is incompatible with the professional standards expected of staff

## Expected culture

The school promotes an open and transparent culture in which staff understand professional boundaries, feel confident to self-refer when they may have inadvertently caused concern, and report behaviour that does not feel right. Staff will not be penalised for raising a concern in good faith, even where it is not substantiated.

## Reporting a concern

A concern must be shared with the Headteacher immediately and without delay. It may be reported verbally in the first instance, but an accurate written record should follow as soon as practicable. The DSL may receive a report or provide safeguarding advice, but must ensure that the Headteacher is informed. If the concern is about the Headteacher, it must be reported to the Chair of Governors. If there is a conflict of interest, the matter must be referred to the alternative senior person identified in the Child Protection and Safeguarding Policy or directly to the local authority designated officer (LADO).

Where a person is unsure whether behaviour meets the harm threshold, the Headteacher or Chair will seek advice from the LADO without delay. Immediate risks to a child must be addressed through the school’s safeguarding procedures and, where necessary, the police or children’s social care.

## Initial response and decision making

The Headteacher will collect the available facts, speak to the person raising the concern and, unless inappropriate, speak to the individual concerned. The Headteacher will decide whether the behaviour:

- is consistent with the Staff Code of Conduct and requires no further action other than feedback or learning
- is a low-level concern requiring management action, support, training or consideration under disciplinary procedures
- may meet the harm threshold and must be managed under the allegations procedure with LADO advice
- indicates a wider safeguarding or organisational issue requiring action

Decisions and reasons will be recorded. The person who raised the concern will be told that it has been received and addressed, while respecting the confidentiality and employment rights of others.

## Allegations meeting the harm threshold

An allegation may meet the harm threshold where an adult has behaved in a way that has harmed 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; or behaved in a way that indicates they may not be suitable to work with children. Such matters are not investigated as low-level concerns and will be referred to the LADO in accordance with KCSIE and the school's allegations procedure.

## Records and review

The school will keep a secure, confidential record containing a clear summary of the concern, how it was followed up, the decision, action taken and the reasons for that decision. The Headteacher and DSL will review records periodically to identify patterns concerning an individual or the wider staff culture. A pattern may require consultation with the LADO, disciplinary action, training, supervision or policy change.

Low-level concern records will be retained at least until the individual leaves the school's employment, or longer where the Records Management Policy or safeguarding advice requires it. Access will be limited to those who need it. Records will be handled in accordance with UK GDPR, the Data Protection Act 2018 and the Data Use and Access Act 2025.

## Employment references

Employment references will include substantiated safeguarding concerns or allegations that meet the harm threshold where relevant to suitability to work with children. Low-level concerns that are false, unfounded, unsubstantiated or malicious will not be included. A pattern of substantiated low-level concerns will be considered carefully against KCSIE and with HR advice before any disclosure.

## Confidentiality and whistleblowing

The identity of a person raising a concern will be protected as far as reasonably possible, but absolute confidentiality cannot be promised where information must be shared to safeguard a child, ensure a fair process or comply with the law. A person who feels unable to use this process should use the Whistleblowing Policy or the NSPCC whistleblowing advice line.

## Monitoring and review

The Headteacher and DSL will review this policy annually and sooner following changes to statutory guidance, a relevant incident or evidence that practice requires improvement.

## Low Level Concern Reporting Form

Report concerns immediately. This form supports an accurate record and must not delay a verbal report where a child may be at risk. Return it securely to the Headteacher or DSL; concerns about the Headteacher must go to the Chair of Governors.

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| Your name and role | |

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| Date and time of report | |
| Name and role of person concerned | |
| What happened, when and where | |
| Why the behaviour caused concern or appeared inconsistent with the Staff Code of Conduct | |
| Children or young people involved and any immediate risk | |
| Other witnesses or relevant information | |
| Action already taken | |
| Signature | |

**For completion on receipt**

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| Date and time received | |
| Received by | |
| Immediate safeguarding action | |
| Decision and action | |
| Reasons for decision | |

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| LADO consultation and outcome, if applicable | |
| Signature and date | |