



S11b LOW-LEVEL CONCERNS POLICY

Reviewed: Education and Policy Committee
Approved: Full Governing Body

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INTRODUCTION

Westminster Abbey Choir 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 pupils achieve their very best.

Safeguarding and promoting the welfare of children is defined in the DfE's Keeping Children Safe in Education (KCSiE) (2026) as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

This Low-Level Safeguarding Concerns Policy has been authorised by the Governing Body, applies to the whole school and is addressed to all members of staff and volunteers. This policy applies wherever staff or volunteers are working with pupils even where this is away from the school, for example at an activity centre or on an educational visit.

DEFINITIONS

Staff - In our school the term 'staff', in the context of safeguarding, is inclusive of all staff and should be interpreted very widely to mean anyone associated with the school, whether working in or on behalf of the school, engaged as a paid employee (including supply teachers), workers or contractor, or unpaid members of staff or volunteers or students on placement, It also includes anyone who is part of the Governing Body.

Low-Level Concern - The term 'low-level' concern does not mean that a concern is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - 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 of work and does not meet the harm threshold.

LADO – the LADO is the Local Area Designated Officer. The role of the LADO is set out in HM government guidance *Working Together to Safeguard Children*. The Officer (LADO) is responsible for managing allegations against adults who work with children. This involves working with police, children's social care, employers and other involved professionals. The LADO does not conduct investigations directly, but rather oversees and directs them to ensure thoroughness, timeliness and fairness. Ordinarily, to ensure impartiality, the LADO will not have direct contact with the adult against who the allegation has been made, or the family of the child/children involved but will, as part of their role ensure that these have information regarding outcomes.

Other school policies and procedures are also directly relevant to safeguarding and the following in particular may be consulted in conjunction with this policy: S11 Safeguarding; S69 Online Safety; S43 School Trips and Educational Visits; S08 First Aid and Medical Care; S09 Health and Safety Management and Risk Assessment, S42 Recruitment and Selection of Staff - Procedures and Guidance, S57 Code of Conduct for School Staff; S52 Whistleblowing.

1. A WHOLE SCHOOL APPROACH TO SAFEGUARDING

As part of a whole school approach to safeguarding, Westminster Abbey Choir School ensures that we 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. Creating a culture in which **all** concerns about adults, no matter how small, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

Early identification and prompt management of all concerns about the behaviour of adults who work or volunteer with children is critical to effective safeguarding. (KCSIE 2026) requires low-level concerns to be shared.

Schools are required to:

- ensure there is a formalised mechanism for reporting low-level concerns;
- allow staff to self-report to the school to protect themselves in situations where they may have found themselves compromised;
- identify patterns of behaviour that are concerning;
- ensure the school continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

Staff should therefore,

- a) **report any behaviour by another adult** towards a pupil or another child that may have concerned them
- b) **self-report** in any situation where they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leave them vulnerable

2. CONCERNS REGARDING THE BEHAVIOUR OF ANOTHER ADULT TOWARDS A CHILD

A low-level concern report should be used when a member of staff is concerned about the behaviour of another adult towards a pupil or another child. This is not just where it is clear that a professional boundary has been broken: anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate.

Some of the circumstances in which staff must make a low-level concern report might be:

- any incident where they feel their actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;
- any adult being overfriendly with pupils, allowing first names to be used, or encouraging the use of nicknames of staff or pupils;
- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- any physical intervention, contact or one-to-one situation that falls outside normal professional practice, could be misinterpreted, or causes concern.any incident where a staff member has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any social contact with pupils outside of School (other than planned/authorised events,

educational visits or trips, or insignificant incidents such as passing a pupil in the street or in a shop or noticing they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;

- if a pupil becomes aware of and/or uses a staff member's home address, mobile or home phone number, or non-school e-mail address other than in line with agreed protocols;
- the fact of, and explanation for, any one-to-one contact with a pupil on School trips, particularly if this takes place in a private space such as a bedroom;
- non-trivial illnesses or accidents of pupils on School trips;
- any incident where, for whatever reason, a member of staff has not complied with the Staff Code of Conduct.

This is not an exhaustive list. Staff who are unsure of whether to complete a neutral notification are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made.

Appendix A provides distinctions between concerns that would be defined as low-level and do not meet the harm threshold and those concerns or allegations that may meet the harm threshold. Staff do not need to determine whether the behaviour in question constitutes a low-level concern or meets the harm threshold, that determination will be made by the Headteacher, in consultation with the Designated Safeguarding Lead (DSL) and, if necessary, the Local Authority Designated Officer (LADO).

Staff should refer to Part Four of *Keeping Children Safe in Education* 2026 (KCSIE 2026) and the school's Safeguarding Policy for how to deal with concerns or allegations that may meet the harm threshold and might indicate a person will pose a risk of harm if they continue to work with children.

3. SELF-REPORTING

From time to time an individual may find themselves in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

4. REPORTING LOW-LEVEL CONCERNS

Almost always, there will be a perfectly innocent explanation for what has occurred, and staff should not feel awkward about making a report or being the subject of a report. Reporting these types of concerns is a neutral act and the Head will, on receiving a report, decide how to best approach the concern raised.

A member of staff who makes a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the school's Whistleblowing Policy.

Low-level concerns should never be considered a mechanism for raising malicious, vexatious or knowingly false allegations. Such reports will be addressed under the school's disciplinary procedures where appropriate.

THE PROCESS

All Low-level concerns should be reported to the Headteacher as soon as reasonably possible, and in any event, within 24 hours of becoming aware of it (where the concern refers to a particular incident). Low-level concerns can be made in person to the Headteacher, but staff are encouraged to put their concerns in writing using the Confide application. Where the low-level concern relates to the Deputy Head, this should be reported directly to the Headteacher by email due to the Deputy Head also having access to Confide.

Where the low-level concern relates to The Headteacher, or where there is a conflict of interest in reporting the matter to The Head, this should be reported directly to the Dean, Dr David Hoyle as Chair of the Governing Body, by direct email using the email address book or via the Dean's PA, Ruth Cohen: Ruth.Cohen@westminster-abbey.org

RESPONDING TO LOW-LEVEL CONCERNS

Low-level concerns will be shared with the Headteacher and Designated Safeguarding Lead (DSL) unless there is a conflict of interest in doing so (see above). The Headteacher and DSL will review the records so that potential patterns of concerning problematic or inappropriate behaviour can be identified. They will consider whether the reported matter is indeed a low-level concern or whether it should be reclassified as an allegation that meets the 'harms threshold' and dealt with as outlined in the Safeguarding Policy. Where there is in any doubt whatsoever about the classification of a reported concern, the Headteacher, or DSL (as appropriate) will seek advice from the Local Authority Designated Officer (LADO) on a no-names basis.

Having established that the concern is low-level, the Headteacher or DSL (as appropriate) will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the low-level concern has been raised by a third party, in the investigation the Head or DSL will speak to the individual who raised the concern, to any witnesses and to the person involved unless advised not to do so by the LADO/other relevant agencies, where they have been contacted. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

Most low-level concerns by their very nature are likely to be minor and will simply require a conversation with the individual about whom the concern has been raised and/or management guidance, training etc. Conversations will determine whether staff may require support to effect change in their behaviour.

Some low-level concerns may also raise issues of misconduct or poor performance which are unrelated to safeguarding. The Headteacher will consider whether this is the case by referring to the school's disciplinary procedure and taking advice from HR. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR.

Following investigation, if it is determined that the behaviour is entirely consistent with the organisation's staff code of conduct and the law, the Headteacher will,

- a) update the individual in question and inform them of the action taken as above,
- b) speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law

Where a low-level concern relates to a supply teacher, agency worker or contractor, the Headteacher will ensure the concern is shared with the individual's employer in accordance with

KCSIE and local safeguarding procedures so that any potential patterns of inappropriate behaviour can be identified. In accordance with KCSiE 2026, the Headteacher is the ultimate decision maker in respect of all low-level concerns related to Choir School staff although it is recognised that they may wish to consult with the designated safeguarding lead or Abbey Safeguarding Officer and take a more collaborative decision-making approach when coming to a decision. Where low-level concerns relate to an Abbey employee employed in a department outside of the Choir School, the Headteacher will treat the member of staff as a contractor to the Choir School and share the low-level concern with the relevant Abbey line manager and the Abbey Safeguarding Officer for them to action as appropriate.

RECORDING LOW-LEVEL CONCERNS

All low-level concerns (even those which turn out to be of no concern) will be recorded in writing. The record will set out the details of the concern, the context in which the concern arose and action taken including rationale for decisions reached. The name of the individual sharing their concerns should also be noted but if the individual wishes to remain anonymous that will be respected as far as possible.

Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These may be used to demonstrate a pattern of behaviour.

Records will be held securely by the Headteacher in a secured/restricted file. From April 2024, Westminster Abbey Choir School has used the computer application “Confide” as an online tool to enable staff to report low level concerns accurately and efficiently. All staff receive training in how to submit a low-level concern using Confide.

REVIEWING LOW-LEVEL CONCERNS

The Headteacher will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of inappropriate, problematic or concerning behaviour are identified.

Where a pattern of behaviour is identified in respect of a specific individual, the Headteacher will consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

The Governing Body will also periodically review anonymised samples of low-level concerns in order to ensure that concerns have been responded to promptly and appropriately.

DATA PROTECTION AND CONFIDENTIALITY

The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-level Concerns Policy and in keeping records of low-level concerns secure.

Data protection law permits the processing of sensitive personal data in order to safeguard children and individuals at risk. This is subject to appropriate safeguards. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the School's Safeguarding Policy. All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the School under the Low-level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. For further information, please refer to the Abbey's Data Protection Policy.

RETAINING RECORDS OF LOW-LEVEL CONCERNS

Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns which are held relating to them will be retained at least until the individual leaves the School or for the same duration as that individual's personnel file are kept after leaving the School. Concerns will not be included in any onward reference, except as set in the *References* section below.

REFERENCES

No record will be made of the concern on the individual's personnel file and no mention made in job references unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.

Part three of KCSIE 2026 (paragraph 521) states that "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. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference."

APPENDIX A – SPECTRUM OF BEHAVIOUR

Concern or allegation that may meet harm threshold	Behaviour which indicates that an adult who works with children 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 they 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.
Low-level concern	Does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working with children may have acted in a way that: • is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work; and • does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.
Appropriate conduct	Behaviour which is entirely consistent with the organisation’s staff code of conduct, and the law.