



Low Level Concerns Policy

Rookwood School

October 2025

Date of adoption of this policy	October 2025
Date of last review of this policy	April 2022
Date for next review of this policy	September 2028
Policy owner	Head
Proprietor	Amit Mehta (ILG)

1. Purpose

Rookwood School (“the school”) understands the importance of fostering a culture of openness, trust and transparency, promote professional boundaries and reduce the possibility of serious concerns later. This supports child safeguarding and staff welfare. (cf. KCSIE 2025) A low level concerns log ensures that any concern (however small) about the behaviour of an adult (staff, volunteer, contractor) in or on behalf of the school which does not meet the harm threshold is dealt with appropriately.

2. Definitions

Low-Level Concern

A behaviour by an adult which:

- Is inconsistent with the school’s Staff Code of Conduct (including behaviour outside work)
- Does not meet the harm threshold (i.e. not considered serious enough to refer to the Local Authority Designated Officer (LADO))

Examples include (but are not limited to):

- Being overly friendly with pupils
- Showing favouritism
- Engaging one-to-one with a pupil behind a closed door
- Causing embarrassment to a pupil

3. Scope

This policy applies to:

- All staff (teaching and non-teaching), volunteers, contractors or anyone working on behalf of the school.
- Behaviour both inside and outside school if relevant to their role or may affect the school’s safeguarding obligations.

The Low-Level Concerns Policy operates in conjunction with the following:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Data Protection Policy

4. Principles

- All staff should be clear what constitutes appropriate behaviour and what is not.
- All concerns, even small ones or “nagging doubts”, should be reported. Early intervention can prevent escalation.
- Confidentiality should be maintained as far as possible, consistent with the need to investigate appropriately.
- No adult should feel discouraged from self-reporting or from raising a concern about someone else.
- Records of low-level concerns are kept securely, and reviewed for patterns.
- The Head (or Designated Senior Leader) is ultimately responsible for managing low-level concerns; the Designated Safeguarding Lead (DSL) will receive and log concerns; in many cases the DSL may conduct initial action.

5. Procedure

1. Reporting a Concern

- Any member of staff who has a low-level concern should report it to the DSL (or Head). If the concern is about the DSL, it should go to the Head (or Head of Advisory Board).
- Staff should speak to the Head/DSL about their concern and then follow this with an email. The report should include:
 - Who is raising the concern (unless anonymous)
 - Who the concern is about
 - Date, time, and context of concern
 - Description of behaviour (facts, what was seen / said)
 - Any witnesses

2. Initial Assessment

- The DSL (or person receiving the concern) considers whether the concern indeed meets the harm threshold. If there is any doubt, they should consult LADO or equivalent for advice.
- If it is a low-level concern, no formal disciplinary process is initiated immediately unless repeated or serious.
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3. Action Taken

Depending on the nature of the concern, actions may include:

- Informal discussion with the staff member about the behaviour, reminding them of the staff code of conduct or boundary expectations
- Additional training, mentoring or supervision

- Monitoring the behaviour
- If patterns emerge, escalation to more formal action, which might involve HR or disciplinary procedures
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4. Recording

- All low-level concerns must be recorded in writing by the DSL (or delegated person). Every record should include:
 - the details of the concern;
 - context;
 - action taken;
 - outcome;
 - name of person raising concern (unless anonymous) and date.
- Records must be stored securely, be confidential, and retained for an appropriate period (e.g. until individual leaves employment plus a set period).

5. Review and Patterns

- DSL/Head should regularly review the log of low-level concerns to identify any patterns of behaviour across individuals or teams.
- Consider whether behaviour, even if low-level, collectively indicates something more serious; if so, refer to LADO.

6. Feedback and Reflection

- Where appropriate, share learning (without breaching confidentiality) with wider staff to improve practice.
- Use data from low-level concerns to inform training, policy reviews, supervision etc.

7. References and Disclosure

- Low-level concerns are not to be included in references unless they are part of misconduct or poor performance matters that would normally be disclosed.
- If multiple low-level concerns combine to meet the harm threshold and are substantiated, then they may be referenced like any other serious safeguarding concern.

6. Roles & Responsibilities

- **Head**
Ultimate decision-maker for all low-level concerns; ensures policy implementation; ensures adequate resources for training, recording, review.
- **Designated Safeguarding Lead (DSL)**
Receives reports; keeps records; carries out initial assessments; monitors patterns; ensures appropriate action taken.
- **Staff (All Staff, Contractors, Volunteers)**
Be familiar with code of conduct; report any concern they have; self-report if applicable.
- **Head Office**
Ensure policy is in place; reviews periodically; assurance from School Leadership that policy is working.

Confidentiality and Anonymity

The identity of the person raising the concern should be recorded, but anonymity may be preserved if they request, unless impossible due to nature of investigation.

The person the concern is about should be told (as appropriate) and given opportunity to respond, depending on the action.

Confidentiality must be balanced against the need to protect pupils and others.

7. Monitoring & Review

- Annual (or more frequent as needed) audit of low-level concerns: numbers, types, outcomes, any trends.
- Policy to be reviewed at least once a year or whenever KCSIE, local or legal expectations change.
- Training for staff on this policy during induction and regular refresher sessions.

8. Version Control

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