WELLFIELD INFANT AND NURSERY SCHOOL

Whistleblowing and Low Level Concerns Policy – this includes managing allegations against staff.

December 2025

Author	Joanne Thirkill
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Ratified by	
Date of ratification:	

The Governing Body and Staff of Wellfield Infant and Nursery School seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. In the event that members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, the Governing Body of Wellfield Infant and Nursery School has established the following Whistle Blowing Policy which acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion.

Throughout this policy, the term "whistle blower" denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense and is entirely consistent with the terminology used by Lord Nolan as recommended in the Second Report of the Committee on Standards in Public Life: Local Spending Bodies published in May 1996.

Wellfield Infant and Nursery School is committed to tackling fraud and other forms of malpractice and treats these issues seriously. Wellfield Infant and Nursery School recognises that some concerns may be extremely sensitive and has therefore developed a system that allows for the confidential raising of concerns within the school environment but also has recourse to an external party outside the management structure of the school.

Wellfield Infant and Nursery School is committed to creating a climate of trust and openness so that a person who has a genuine concern or suspicion can raise the matter with full confidence that the matter will be appropriately considered and resolved. The provisions of this policy apply to matters of suspected fraud and impropriety and not matters of more general grievance that would be dealt with under the School's own Grievance Procedures.

When Might the Whistle Blowing Policy Apply?

The type of activity or behaviour which Wellfield Infant and Nursery School considers should be dealt with under this policy includes:

- Manipulation of accounting records and finances
- Inappropriate use of school assets or funds
- Decision-making for personal gain
- Any criminal activity
- Abuse of position
- Fraud and deceit
- Serious breaches of the School's Procedures which may advantage a particular party (for example tampering with tender documentation or failure to register a personal interest)

What Action Should the 'Whistle Blower' Take?

Wellfield Infant and Nursery School encourages the 'whistle blower' to raise the matter internally in the first instance to allow those school staff and governors in positions of responsibility and authority the opportunity to right the wrong and give an explanation for the behaviour or activity. Wellfield Infant and Nursery School has designated a number of individuals to specifically deal with such matters and the 'whistle blower' is invited to decide which of those individuals would be the most appropriate person to deal with the matter:

Mrs Joanne Thirkill:	Cllr Sue Maitland	Mrs Donna Lamey
Headteacher	Joint Chair of Governors	Joint Chair of Governors
Wellfield Infant and Nursery School School Church Lane Ashton-opn-Mersey Tel: 0161 962 1928	Contact details may be requested from the school office	Contact details may be requested from the school office

The 'whistle blower' may prefer to raise the matter in person, by telephone or in writing to one of the above named individuals. All matters will be treated in strict confidence and anonymity will be respected wherever possible.

Alternatively, if the 'whistle blower' considers the matter too serious or sensitive to raise within the internal environment of the school, the matter should be directed in the first instance to the appropriate department within Trafford Council.

Trafford Council switchboard number: 0161 912 2000
Trafford Council Audit & Assurance Service contact number: 0161 912 1275

Trafford Council has its own procedures for dealing with such matters and will ensure every effort to respect the confidentiality of the 'whistle blower'.

The Local Authority will ensure relevant officers of the DFE are informed as appropriate. In addition information and advice can be obtained from the charity, 'Public Concern at Work'. This charity offers free legal advice in certain circumstances to people concerned about serious malpractice at work. Their literature states that matters are handled in strict confidence and without obligation. Contact details for the charity are as follows:
Telephone Whistleblowing Advice Line: 020 7404 6609
General enquiries: 020 3117 2520
Email UK advice line: whistle@protect-advice.org.uk

How Will the Matter be Progressed?

The individual(s) in receipt of the information or allegation, the Investigating Officer(s), will carry out a preliminary investigation. This will seek to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. The initial assessment may identify the need to involve third parties to provide further information, advice or assistance, for example involvement of other members of school staff, legal or personnel advisors, the police, Trafford Council or the DFE.

Records will be kept of work undertaken and actions taken throughout the investigation. The Investigating Officer(s), possibly in conjunction with the Governing Body, will consider how best to report the findings and what corrective action needs to be taken. This may include some form of disciplinary action or third

party referral such as the police. The 'whistle blower' will be informed of the results of the investigation and the action taken to address the matter. The matter will be reported to the Governing Body and, or Trafford Council depending on the nature of the concern or allegation and whether or not it has been substantiated.
If the 'whistle blower' is dissatisfied with the conduct of the investigation or resolution of the matter or has genuine concerns that the matter has not been handled appropriately, the concerns should be raised with the Investigating Officer(s), the Governing Body and, or directed to Trafford Council.

Respecting confidentiality

Wherever possible Wellfield Infant and Nursery School seeks to respect the confidentiality and anonymity of the 'whistle blower' and will as far as possible protect him or her from reprisals. Wellfield Infant and Nursery School will not tolerate any attempt to victimise the 'whistle blower' or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Raising unfounded malicious concerns

Individuals are encouraged to come forward in good faith with genuine concerns with the knowledge they will be taken seriously. If individuals raise malicious, unfounded concerns or attempt to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances.

Roles and Responsibilities

This section outlines the roles and responsibilities for the main parties involved in creating a safe environment where individuals with a concern about school practices come forward to report them in the public interest. These lists are not exhaustive.

➢ The Responsible Officer: The Head teacher has overall responsibility for the maintenance and operation of this policy. The Head teacher will maintain a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Governing Body.

➢ Governors and Senior Leaders: Governors and Senior Leaders play a lead role in creating an open and transparent environment where school standards are embedded, monitored and followed. They are responsible for ensuring that:

- all staff are aware of this policy and associated procedures;
- they set a good example by their behaviour;
- all reports of malpractice reported to them are taken seriously and investigated;
- employees who make an allegation in the public interest are not victimised; and
- confidentiality is preserved at all times unless agreed otherwise

➢ Line Managers: In order to achieve the consistent application of this policy and its associated procedure the main responsibilities of a line manager are to:

- set a good example by their behaviour;
- ensure good practice is followed in the work areas that they manage;
- respond to and support employees who report concerns under this policy;
- treat all concerns seriously and sensitively;
- encourage employees to raise their concerns in writing;
- provide full and clear advice to employees on the procedures to be followed;
- ensure that employees are not victimised at any stage, either before and after a matter is resolved.

If line managers do not carry out their responsibilities under this policy then they may be subjected to disciplinary action and claims from the employee that they also contravene the policy.

➢ Employees: Employees are responsible for:
• reporting any public interest concerns they have as early as possible;
• raising the concerns in writing (if possible);
• putting their name to any allegations rather than making them anonymously (where possible)
• reporting if they are victimised after raising a concern under this policy;
• acting in the public interest at all times.

➢ Human Resource provider: The Human Resource provider plays an important role in supporting the school to act in an environment with the highest possible standards of openness, probity and accountability. Their role is to:
• support managers and employees on the interpretation and application of this policy;
• provide skills and knowledge-based training to enable managers to fulfill their responsibilities under this policy; and be aware of changes in legislation.

Conclusion

Existing good practice within Wellfield Infant and Nursery School in terms of its systems of internal control both financial and non-financial and the external regulatory environment in which the School operates ensure that cases of suspected fraud or impropriety rarely occur.

This Whistle Blowing Policy is provided as a reference document to establish a framework within which issues can be raised confidentially internally and if necessary outside the management structure of the school. This document is a public commitment that concerns are taken seriously and will be fully investigated.

This policy should be read in conjunction with the Low Level Concerns Policy.

Signed: **Cllr. S.Maitland** (in collaboration with School Effectiveness Committee)
Chair of Governors

Signed: Mrs J.Thirkill
Head Teacher

December 2025

Low Level Concerns

Section 1: allegations that may meet the harm threshold	**Suspension of the accused until the case is resolved** **Definitions for outcomes of allegation investigations** **Procedure for dealing with allegations** **Additional considerations for supply teachers and all contracted staff** **Timescales** **Specific Actions** **Unsubstantiated, unfounded, false or malicious allegations** **Confidentiality and information sharing** **Record Keeping** **References** **Learning lessons** **Non-recent allegations**
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Section 1: Allegations that may meet the harm threshold

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors if the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it

necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Support may include signposting the individual to appropriate external sources such as their trade union, education services, or the local authority. The effectiveness of this support is based on the suitability and availability of the support offered and its intended impact, rather than the individual's personal perception of the outcome.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

- **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

- **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

- **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

- **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

To promote a culture of openness, trust and transparency, the Headteacher and DSL play a central role in modelling safe professional behaviours and setting clear expectations. The Headteacher and DSL ensure regular reminders are given through staff briefings, induction, supervision and training so that staff understand what constitutes a low-level concern and the importance of reporting it promptly.

Staff are consistently reassured that low-level concerns are welcomed, recorded and responded to sensitively, proportionately, and without judgement. The school provides clear, confidential routes for reporting concerns, including direct conversation with the Headteacher or DSL, email reporting options, and opportunities to raise concerns as part of staff supervision. Staff are encouraged to seek advice if they are unsure whether something constitutes a low-level concern, and reassured that raising such concerns is a protective measure, not an accusation.

The leadership team actively promotes a "no blame" culture, making it clear that raising low-level concerns is a professional responsibility and contributes to whole-school safeguarding. Leaders model openness by discussing learning from anonymised cases and demonstrating that low-level concerns are taken seriously while being managed fairly and supportively.

The DSL ensures that all low-level concerns are recorded, reviewed for patterns, and followed up appropriately. The Headteacher provides oversight to ensure consistency and transparency, and ensures staff feel safe and supported when coming forward.

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the wider DDSL team.

In responding to low-level concerns, the school ensures that all actions are proportionate, fair, clearly documented and aligned with the school's code of conduct and safer working practice expectations.

The headteacher or DSL/DDSL will:

- **Clarify the facts** of the concern, including context, intent and impact, before making any judgement about the nature of the behaviour.
- **Ensure the process is supportive, not punitive**, and rooted in safeguarding rather than disciplinary action unless the threshold is met.

- **Record the concern** in the school's low-level concerns log, including the rationale for decisions and any actions taken.
- **Assess whether the concern indicates a pattern** of behaviour, either for the individual or across the staff team, and take further steps where patterns emerge.
- **Take proportionate action**, which may include reflective conversations, supervision discussions, additional training, pastoral or professional support, or refinement of practice.
- **Ensure the individual is supported**, including signposting to appropriate services if they would benefit from external professional, pastoral, or union support.
- **Maintain confidentiality**, sharing information only with those who need to know in order to protect pupils and support staff appropriately.
- **Consider thresholds**, and escalate to an allegation process or external agencies if the concern indicates behaviour that is harmful, abusive or potentially criminal.

The headteacher will collaborate with the DSL/DDSL team when appropriate, particularly where a low-level concern may relate to wider safeguarding trends, vulnerabilities or professional practice issues. Decisions will always be documented with clear reasoning to ensure transparency and defensibility.

Where anonymous low-level concerns are received, they will still be recorded and considered, with appropriate steps taken to establish sufficient clarity while respecting the anonymity of the reporter.

The school also uses learning from low-level concerns to help **identify training needs, strengthen safer working practices, and promote a culture of openness**, ensuring staff feel confident to raise concerns early and appropriately.

Developing and implementing a low-level concerns policy: A guide for organisations which work with Children

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Signed: **Cllr. S.Maitland** (in collaboration with School Effectiveness Committee)
Chair of Governors

Signed: Mrs J.Thirkill
Head Teacher

December 2025