RPT Low-Level Concerns Policy

With reference to Keeping Children Safe in Education – September 2026

Date	Owner	Summary	Next Review
September 2026	EDoS	Policy created	September 2027
October 2026	EDoS	Approval: BoT	October 2027
November 2026	EDoS	Published:SmartLog	November 2027

Contents of policy

1. Mission Statement
2. Aims of policy
3. Legislation and Statutory Guidance
4. Definitions
5. Equality Statement
6. Roles and responsibilities
7. Purpose
8. Definition of a Low-Level Concern
9. Reporting Low-Level Concerns
10. Can the person reporting remain anonymous?
11. Should staff report concerns about themselves (ie self-report)?
12. Recording and retention of concerns
13. Responding to Low-Level Concerns
14. Should the Low-Level Concerns file be reviewed?
15. References
16. Confidentiality
17. What is the role of the governors?
18. Other complaints and concerns about safeguarding practices
19. Training
20. Monitoring arrangements
21. Links to other policies
22. APPENDIX A – Low-Level Concern Form

1. Mission Statement

Rise Partnership Trust schools are committed to pursuing excellence in all that we do; providing the most effective education, therapy, support and provision for all.

Our mission is for every child and young person to be successful in their future lives. For this to happen we must champion the unique potential of every pupil. We know that an excellent education underpinned with opportunities to love, learn and laugh is transformative, and we are committed to this motto.

We take into account pupils' varied life experiences and needs, providing equal opportunities for all pupils, whatever their age, disability, race, religion or belief, gender / gender identity or socio-economic background, to ensure that every child really does matter.

2. Aims of policy

Rise Partnership Trust Schools aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Staff maintain an attitude of 'it could happen here' where safeguarding is concerned.

This Policy is reviewed annually to ensure compliance with current regulations and law and must be read in conjunction with our Safeguarding and Child Protection Policy and other relevant RPT policies.

This policy applies to all staff and other individuals who work or volunteer in school. Where staff work across multiple sites any low-level concerns about colleagues should be reported to the relevant Headteacher.

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education September 2026, Working Together to Safeguard Children, and the Governance Handbook. We comply with this guidance and the procedures set out by the Brent Safeguarding Children Partnership (BSCP) in line with Working Together to Safeguard Children.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

- The Childcare (Disqualification) Regulations 2009 and Childcare Act 2006, which set out who is disqualified from working with children
- *This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.*

4. Definitions

Safeguarding the welfare of children means:

- Protecting children from maltreatment
- Preventing 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
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Children includes everyone under the age of 18.

5. Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

All pupils attending RPT schools have Special Educational Needs and Disabilities. As well as the focus upon supporting pupils with SEND we also give special consideration to children who:

- Have special educational needs, disabilities or certain health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

- Are asylum seekers
- Have a parent in prison

6. Roles and responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff, governors, trustees, volunteers, contractors and visitors have a responsibility to safeguard children and to maintain an attitude of **'it could happen here'**. Everyone working within Rise Partnership Trust schools should be aware of their role in identifying, reporting and responding appropriately to low-level concerns.

Trust Board of Trustees
The Board of Trustees has strategic responsibility for safeguarding across Rise Partnership Trust. Trustees will ensure that appropriate safeguarding policies, including this Low-Level Concerns Policy, are in place, are reviewed annually and comply with statutory guidance. Trustees will seek assurance that appropriate procedures are being implemented consistently across all schools, that records are maintained securely, and that safeguarding culture promotes openness, transparency and accountability.

Trust Senior Safeguarding Lead
The Trust Senior Safeguarding Lead provides strategic leadership, oversight and quality assurance for safeguarding across all Rise Partnership Trust schools. They support Headteachers, Designated Safeguarding Leads and senior leaders in implementing statutory safeguarding requirements, promote consistent safeguarding practice across the Trust and provide advice where complex safeguarding issues arise. The Trust Senior Safeguarding Lead will monitor safeguarding arrangements, identify emerging themes or patterns across schools and provide appropriate support and challenge to ensure that safeguarding remains effective throughout the Trust.

Chief Executive Officer (CEO)
The Chief Executive Officer has overall executive accountability for safeguarding within Rise Partnership Trust and ensures that effective safeguarding arrangements operate across all Trust schools. The CEO will ensure that Headteachers and senior leaders receive appropriate support and challenge in fulfilling their safeguarding responsibilities. Where concerns relate to members of the Central Trust Team, the CEO will receive and manage low-level concerns in accordance with this policy. Low-level concerns relating to the CEO will be reported to the Chair of Trustees.

Executive Director of Schools
The Executive Director of Schools provides operational oversight of safeguarding across the Trust's schools and supports Headteachers in maintaining effective safeguarding practice. They will provide advice where appropriate, oversee consistency in the application of this policy and receive low-level concerns relating to Headteachers. Where concerns indicate that the harm threshold may have been met, they will ensure that appropriate consultation with the Local Authority Designated Officer (LADO) takes place.

Headteacher
The Headteacher has day-to-day responsibility for implementing this policy within their school. They will ensure that all low-level concerns are taken seriously, recorded appropriately, considered promptly and managed fairly, proportionately and consistently. They are responsible for determining whether a concern remains a low-level concern or whether it meets the threshold for

referral to the LADO or other external agencies. They will also review records regularly to identify any emerging patterns of behaviour and ensure that appropriate action is taken.

Designated Safeguarding Lead (DSL)
The Designated Safeguarding Lead has lead responsibility for safeguarding and child protection within the school. The DSL may receive low-level concerns where the Headteacher is unavailable and will ensure these are shared with the Headteacher as soon as possible. The DSL will support the Headteacher in assessing safeguarding risk, maintaining accurate safeguarding records, identifying patterns of concern and ensuring that safeguarding procedures are followed appropriately. The DSL will contribute safeguarding expertise throughout any investigation or management process.

All Staff, Volunteers, Supply Staff and Contractors
All adults working in or on behalf of Rise Partnership Trust have a responsibility to maintain high standards of professional conduct and to act in accordance with the Staff Code of Conduct. They must report any low-level concern about the behaviour of another adult working with children, no matter how small, as soon as possible. This includes concerns about themselves where they believe their behaviour may have been misunderstood or may have fallen below the expected professional standards. Staff should never assume that someone else will report a concern and should understand that sharing concerns helps to safeguard children and protect colleagues from potential misunderstandings or false allegations.

Local Academy Board (LAB)
The Local Academy Board will receive appropriate safeguarding reports from the Headteacher to provide assurance that this policy is operating effectively within the school. Governors will not be involved in managing individual low-level concerns but will monitor the implementation of the policy through anonymised reporting, safeguarding monitoring activities and scrutiny of safeguarding arrangements to ensure that an open and transparent safeguarding culture is maintained.

7. Purpose
This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Safeguarding and Child Protection policy are lived, monitored, and reinforced.

8. Definition of a low-level concern
A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of Rise Partnership Trust may have acted in a way that:

- is inconsistent with the Code of Conduct, including inappropriate conduct outside of work (specifically related to safeguarding; and
- does not meet the allegations threshold of harm or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over 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; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the Code of Conduct), are shared responsibly and with the right person, and recorded and dealt with appropriately. Creating such a culture enables concerns to be identified early, minimises the risk of abuse and protects children as well as adults working in school. Ensuring Low-Level concerns are dealt with effectively should also protect those working in or on behalf of RPT from potential false allegations or misunderstandings.

9. Reporting low-level concerns

Where a low-level concern has been identified, this will be reported as soon as possible to the Headteacher/ provision leader or CEO in the case of Central RPT staff. This includes self-reported concerns. However, it is never too late to share a low-level concern if this has not already happened. The Headteacher remains responsible for determining whether the concern is a low-level concern, requires management action or meets the harm threshold.

Low-level concerns about the Headteacher will be reported to the Executive Director of Schools. Concerns about the Executive Director of Schools will be reported to the CEO and concerns about the CEO will be reported to the Chair of Trustees. Low-Level Concerns about governors/ trustees will be reported to the Chair of the Trust.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Headteacher or CEO in the case of central RPT staff of the details as soon as possible.

10. Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. Anonymous reports will still be considered and assessed on the information available. However, there may be circumstances where anonymity cannot be upheld, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required, in such cases this will be explained and signposting to relevant support will be offered.

11. Should staff report concerns about themselves (ie self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. Where behaviour is consistent with the Code of Conduct feedback will be provided to the individual raising the concern and to the individual concerned, where appropriate. to explain why the behaviour was consistent with the Code of Conduct. Where behaviour is not consistent with the staff Code of Conduct the necessary action will be taken in line with this policy and where appropriate the RPT Disciplinary Policy. This may result in informal action, such as professional advice, training or development and/ or formal action.

12. Recording and retention of concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Appendix A contains a Low-Level Concern (LLC) form that can be used for this purpose. However not having access to the form should not prevent a concern from being shared. Where concerns are reported verbally a record of the conversation will be made by the Headteacher/ provision leader or CEO which will be signed, timed, and dated. Records will be retained securely in accordance with the school's records retention schedule and UK GDPR/Data

Protection Act 2018. They will remain separate from personnel files unless required to be placed on the personnel file because of disciplinary or safeguarding outcomes.

13. Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headteacher / CEO will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice may also need to be taken)

Where necessary, further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the Code of Conduct: no further action will be required
- constitutes a low-level concern: no further action may be required; alternatively, additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken. Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed:
- Where an accumulation or pattern of low-level concerns suggests a risk of harm, the matter must be treated as an allegation and referred to the LADO/ police in line with Part 4 of KCSIE 2026. In such cases the following will be recorded:
- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

14. Should the low-level concerns file be reviewed?

The Headteacher will review the low-level concerns file whenever a new concern is added and periodically (at least termly) to identify concerning patterns or trends.

15. References

RPT schools should only include in references substantiated safeguarding allegations or concerns that meet the harm threshold. (including a group of low-level concerns about the same individual) that meet the harm threshold. 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.

16. Confidentiality

Any parties affected by or involved in the application of this policy will be expected to maintain an appropriate level of confidentiality. Access to low-level concern records will be restricted to the Headteacher, SSL, DSL and HR where appropriate. Breaches of confidentiality will be taken seriously, especially if they hinder the application of the policy. Failure to maintain confidentiality may result in action being taken under the disciplinary policy arrangements. Disclosure of information may also be a breach under the Data Protection Act (2018) and may lead to action being taken under the provisions of that Act, in addition to action being taken under the disciplinary policy.

17. What is the role of the Governors?

The Headteacher will regularly inform the Local Academy Board about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately. Governors will also assure themselves that the policy is effective in embedding a culture of openness, trust and transparency, and that low-level concerns are being consistently and appropriately managed.

18. Other complaints and concerns about school safeguarding practices

Other complaints can be raised in accordance with our complaints policy.

19. Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including training on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be updated at least annually, and will be in line with advice from our safeguarding partners.

20. Monitoring arrangements

This policy will be reviewed **annually**. At every review, it will be approved by trustees. The effectiveness of the policy will be monitored through safeguarding audits, review of anonymised low-level concern records and governor safeguarding monitoring.

21. Links to other policies

Policies and processes including staff codes of conduct and behaviour policies are in place to support RPT schools to effectively deal with Low-Level Concerns that do not meet harm thresholds.

- Behaviour Policy
- Code of Conduct
- Complaints Policy
- Conduct and Disciplinary Policy
- Health and Safety Policy
- Induction Policy
- Intimate Care Policy
- Medical Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Volunteer Policy
- Whistleblowing Policy

APPENDIX A Low-level Concern Form (Insert School Name)

Name of person about whom concerns have been raised:	
Job title:	
School/ Department:	
Details of the concern: Provide a concise record, including a brief context in which the Low-Level Concern arose, and details which are chronological and as precise and accurate as possible. Please use a separate sheet if necessary.	
Name of person completing form (PRINT NAME): Job title:	
Time and Date when form completed:	
Form received by Name (PRINT NAME): Job title:	
Receipt time and date:	
Have Low-Level Concerns been raised about this individual previously? • If so, provide brief chronological notes. • Consider whether this history, alongside the current concern now meet the threshold for referral set out in KCSIE Section 4, Part 1	
Action Taken: Provide a concise, chronological record of how the concern was followed-up, including details of any conversations held. Ensure that there is sufficient detail to understand the decision-making process that led to either no further action or an action(s).	
☐ Behaviour consistent with Code of Conduct ☐ Low-level concern ☐ Harm threshold met ☐ Referred to LADO ☐ HR informed ☐ Police informed (if applicable)	
Headteacher signature:	
Signature time and date:	

Please use a separate sheet if necessary. This form should be held in a single secure file within each RPT school. In the case of the concern being raised about a member of RPT Central Team this will be held confidentially by the HR Department.

This may be electronic or in hard copy.