

# SACRED HEART HIGH SCHOOL



## WHISTLEBLOWING & LOW-LEVEL CONCERNS POLICY

SEPTEMBER 2023

*To be reviewed September 2024*

*This Policy should be read in conjunction with  
all other Sacred Heart High School Policies*

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## Appendix 1: Low-Level Concerns Form

## **1 INTRODUCTION**

Sacred Heart High School is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees and others with whom we deal, who have serious concerns about any aspect of the school's work to come forward and voice those concerns. It is anticipated that school staff are more likely to be whistle-blowers as they experience school work on a daily basis, but whistleblowing is not limited to employees and others from outside the organisation can also raise concerns under this policy.

We additionally encourage staff to raise lower-level concerns with us, including self-referring under our low-level concerns procedure, if they have done something and then reflected on it and recognised that it might not have been appropriate.

The best way to keep everyone safe is for us all to be vigilant about our own and others behaviour. If staff are confident about the process for voicing low-level concerns (protecting both those who raise the concern and the person about whom the concern has been raised) and rightly perceive this to be a neutral activity, then hopefully reticence to highlight a concern can be reduced,

By encouraging the identification of low-level concerns, we hope to minimise the occurrence of more serious behaviours. The low-level concerns procedure which maintains confidentiality will enable individual staff to be gently reminded of protocols, adding to the awareness already imparted to all staff (through training sessions, the signing of our Code for Ethical Practice and awareness of the Staff Code of Conduct) and others through their own professional organisations.

## **2 PURPOSE**

The purpose of this policy is to

- provide confidence for anyone to whistleblowing (raise serious allegations) and for employees to also be able to raise low-level concerns, by setting out clear channels and procedures for reporting investigating and responding to such reports and allegations.
- encourage and enable employees to raise concerns at an early stage and in the right way. The school would rather that matters are raised when it is just a concern, rather than you waiting for proof;
- ensure that all those who raise concerns, receive a response and are kept informed about how their concerns are being dealt with. (This does not however necessarily mean that they will be privy to any detail in relation to the investigation into the concern raised or any specific outcomes.
- to reassure those who raise genuine concerns, irrespective of the outcome of the investigation, that they will not suffer any repercussions in doing so and that they will not be subjected to any detrimental treatment as a result of raising those concerns.

### **3 SCOPE**

There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. This policy is intended to cover concerns that fall outside the scope of other procedures. These include both

- Serious Allegations (whistleblowing); and
- Low-Level Concerns.

It is recognised however that low level concerns could arise as a result of disclosures under our grievance or other procedures. Low level Concerns may also themselves later result in a grievance being submitted. They are not mutually exclusive.

### **4 PROCEDURE FOR DEALING WITH SERIOUS ALLEGATIONS**

#### **4.1 What is a Serious Allegation**

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Serious allegations (whistleblowing) could include for example where:

- A criminal offence has been committed, is being committed or is likely to be committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which s/he is subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information indicating any matter falling within any one of the above has been, is being or is likely to be deliberately concealed.

At school this could include for example:

- A misuse of school funds and/or financial malpractice
- Public examination fraud
- An unauthorised disclosure of confidential information
- Any conduct likely to damage the school's reputation; and.
- Safeguarding concerns that meet the harm threshold set out in Keeping Children Safe in Education i.e. where 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

## **4.2 The Case Manager**

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

## **4.3 Confidentiality**

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All allegations and reports will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness. You also have a duty to observe this confidentiality.

## **4.4 Timescales**

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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 5 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.

## **4.5 Suspension of the accused before the case is resolved**

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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, a quick (same day) assessment will be made about whether or not the allegation is substantive.

We will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

If in doubt, the case manager will seek views from the school's HR advisor and the LADO (if appropriate), as well as the police and children's social care where they have been involved.

## **4.6 Steps to be taken following an allegation**

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The case manager will (not necessarily in this order)

- **Conduct basic enquiries (investigation)** to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- **Where the allegation includes a child protection/safeguarding dimension**, follow the school's Child Protection and Safeguarding Policy and discuss the allegation with the school's Designated Senior Leader for Child Protection and Safeguarding (DSL) and as appropriate the designated officer at the local authority (LADO). 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 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 and where relevant after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or 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 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 children's social care
- Where appropriate, carefully **consider whether suspension of the individual from contact with children at the school is justified** (see section 4.5 above) or whether alternative arrangements can be put in place. Advice will be sought where appropriate from the LADO, police and/or children's social care services. If immediate suspension is considered necessary agree and record the rationale for this with the DSL/LADO (if child protection is concerned) and with the School Business Manager in all other cases. 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 DSL/LADO or School Business Manager as appropriate 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 DSL/LADO, or School Business Manager as appropriate to initiate the appropriate action in school under our Disciplinary or Capability procedures and/or liaise with the police and/or 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.

- **In any case involving an allegation of abuse against a child or children**, 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 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
- **In any case involving an allegation of abuse against a child or children**, 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

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.

#### **4.7 Confidentiality and information sharing**

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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 children's social care services, if 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 any 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

#### **4.8 Definition of outcomes after investigation**

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- **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 which supports the allegation being made

#### **4.9 Additional considerations for supply teachers & all contracted staff**

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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.

#### **4.10 Specific action following an investigation outcome**

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##### **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 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.

If relevant, the case manager will also consider how best to manage the individual's contact with any child or children (or other staff member) 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 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 (if appropriate) 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 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

### **4.11 Record-keeping**

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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 children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

#### **4.12 References**

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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 which 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

#### **4.13 Learning lessons**

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After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO or School Business Manager (as appropriate) 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.

#### **4.14 Non-recent allegations**

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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 and will report to the LADO as appropriate.

## **5 PROCEDURE FOR DEALING WITH LOW-LEVEL CONCERNS**

Section 4 above covering serious allegations is the safety-net at the end of the process but this section applies to concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the level of seriousness set out in section 4.1 above which includes for safeguarding matters, meeting the KCSIE harm threshold)

## 5.1 What is a low-level concern

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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 LADO.

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

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.

## 5.2 The importance of sharing low-level concerns

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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:

- Requiring all staff to undertake and sign to confirm their safeguarding training every year;
- Requiring staff to sign our [Staff Code of Ethical Practice](#) annually;
- Share with staff our [Staff Code of Conduct](#);
- Through the above and through training sessions, 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 as referred to in section 7.7 of our [Child Protection & Safeguarding Policy](#)
- Empowering staff to self-refer where they find themselves in a position that might be considered unprofessional

- 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

### 5.3 The process for confidentially sharing a low-level concern

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Low level concerns should be shared with **the Headteacher** (known as the recipient) or in her absence the Deputy Headteacher (unless the concern relates to the Headteacher, in which case it should be shared only with the Chair of Governors, Glen Hodgson).

This should be done as soon as reasonably possible and in any event within 24 hours of becoming aware of it (where it relates to an incident). It is however never too late to raise a low-level concern.

- Staff can choose to share the low-level concern with the nominated person verbally or providing a written statement of it, or completing a Low-Level Concerns Form, see Appendix 1.
- The recipient should make an appropriate record of the conversation either at the time or immediately following the discussion
- Sound professional judgement should be exercised by the recipient in determining what information is necessary to record for safeguarding purposes.
- The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern.
- The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

### 5.4 Responding to low-level concerns

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All low-level concerns will be responded to in a sensitive and proportionate way – on the one hand demonstrating that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false low-level concerns or misunderstandings.

Once the Headteacher has received what is believed (by the person raising it) to be a low-level concern, she will (not necessarily in the below order) speak to

- the **person who raised the concern** (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- any **potential witnesses** (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

- the **individual about whom the low-level concern has been raised** (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted)

and review the information.

## 5.5 Decision Making

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The headteacher will use the information collected **to categorise** the type of behaviour as

- appropriate behaviour, or
- behaviour that constitutes a low-level concern; or
- behaviour is (or may) meet the harm threshold either on its own or cumulatively (when considered in the context of other reports) they should consult with/ refer the matter to the LADO and/or other relevant external agencies,

and will determine any further action to be taken. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

## 5.6 Action Taken

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The Headteacher's approach in terms of further action (including following consultation with the LADO where necessary) should also be informed by the following if:

### Behaviour is Appropriate

If it is determined that the behaviour is entirely consistent with the Staff Code of Conduct and the law:

- it will still be important for the Headteacher to update the individual in question and inform them of the action taken as above;
- in addition, the Headteacher will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with our Staff Code of Conduct and the law;
- such a situation may indicate that:
  - the staff code of conduct is not clear;
  - the briefing and/or training has not been satisfactory; and/or
  - the low-level concerns policy is not clear enough.

### Behaviour Constitutes a Low-Level Concern

If it is determined that the behaviour constitutes a low-level concern:

- any investigation of low-level concerns should be done discreetly and, on a need-to-know basis;
- most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;
- in many cases, a low-level concern will simply require a valued-based conversation with the individual about whom the concern has been

raised (in a non-critical or threatening manner). Such a conversation would include clarification on:

- why the behaviour is inappropriate, problematic or concerning,
  - what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and
  - being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.
  - Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- d) If the low-level concerns also raise issues of misconduct or poor performance which are unrelated to safeguarding, the Headteacher may also refer to school's Disciplinary and/or Capability Procedure and taking advice from the school's HR lead on a named or no-name basis where necessary. If the Headteacher considers that the organisation's Disciplinary or Capability Procedure may be triggered by the low-level concern(s) shared, she will should refer the matter to School Business Manager (HR). Any such referral should be made by the Headteacher having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the Headteacher and HR (School Business Manager), so that an holistic view of the individual can be taken. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for the School Business Manager;
- e) how we respond this low-level concerns policy a low-level concern may be different depending on the employment status of the individual who is the subject of the concern. 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.
- f) where low-level concerns do trigger disciplinary or capability, procedures, these procedures should be followed where appropriate. The school will exercise professional judgement and, if in any doubt, they should seek advice from HR and other relevant external agencies including the LADO;
- g) If HR (the school Business Manager) advises that the disciplinary procedure is triggered, we will ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them. The subject of the concern can only be held to account relating to cumulative low-level concerns if these have been addressed individually with them at the time.

#### **Behaviour that meets the harm threshold**

If it is determined that the behaviour reported as a low-level concern (a) may meet the harm threshold, or (b) when considered with any other low-level concerns that have previously been shared about the same individual, may meet the harm threshold:

- a) it will be referred to the LADO/ other relevant external agencies;
- b) we will comply – in all matters relating to safeguarding – with the relevant procedures and practice guidance stipulated by our Local Safeguarding Partnership and in line with our Child Protection and Safeguarding policy.

### **5.7 Record keeping**

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The headteacher will in all cases make appropriate records of the low-level concern and

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
- all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);
- their determination
- the rationale for their decision; and
- any action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and 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 harms threshold we will refer it to the LADO
- Retained at least until the individual leaves employment at the school

### **5.8 References**

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

- The concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated; and/or

### **5.9 Monitoring**

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The Headteacher will regularly inform the Governing Board about the implementation of the low-level concerns procedure set out in section 5 above and any evidence as to its effectiveness. For example, by including reference to it in any safeguarding reports, and providing any relevant data so that any trends and patterns can be identified.

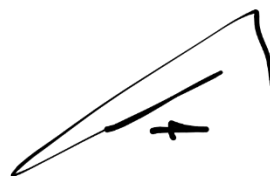
The Governing Board should also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

## 6 RATIFICATION

This policy has been approved by the Staffing, Management & Finance Committee and the Full Governing Body in September 2023. The Policy will be reviewed in September 2024.



Mrs S O'Donovan  
Headteacher



Glen Hodgson  
Chair of Governors



## Appendix 1: Low Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Sacred Heart'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.

You should provide a concise record (online/electronically or hard copy) – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated. Details of concern

Name of staff member:	Department and role:
Signed:	Time and date:

[illegible]

*This record will be held securely in accordance with Sacred Heart High School's low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Sacred Heart High School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations*