

Low Level Concerns policy

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1. Definitions

1.1 Colleague - Employees, Supply or agency staff, Trustees, Governors, volunteers and visitors.

1.2 **Low level concern** - A low-level concern can be defined as 'Any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the Trust may have acted in a way that is inconsistent with the colleague code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO as described in Policy Managing Allegations Against Staff (PMAAS):

or

Any concern which has been disclosed pursuant to PMAAS and which has been determined to be a low-level concern pursuant to section 8 of that Policy.

1.3 **Allegation** - A matter falling with the definition of an Allegation pursuant to PMAAS

1.4 **Low level concern report** - A low-level concern report is the written account of the initial concern and the action taken to respond, in line with this policy, by the Headteacher/CEO. An example has been included at Appendix 1, but it may take the form of an email, word or other document.

1.5 LADO – Local Authority Designated Officer

2. Application of this Policy

2.1 The policy is applicable to all employees (permanent and temporary) of DEMAT. Where applicable, it is also applicable to all Volunteers supporting DEMAT.

The above definitions are included for reference purposes for both School and Central Team staff to enable clarity and transparency when applying this policy.

3. Relationship with DEMAT Values

3.1 The application of this policy must be applied at all times in a way that reflects the values of DEMAT and our Christian Ethos:

Love – We engender love and tolerance between and for our staff, pupils and others to foster an inspiring atmosphere of mutual support.

Community – We are committed to ensuring our schools are a living part of the community and contribute positively to its needs.

Respect – We do everything to provide a caring, safe and secure place for our staff and pupils to be happy and respected in our schools so they may achieve their potential.

Trust – We acknowledge accountability and responsibility for our actions and ensure that we encourage each other to make brave decisions and then learn from any mistakes.

Ambition – We are determined that our schools offer a place for the joy of learning, enabling those of all abilities to thrive and go on to lead rewarding lives.

4. Associated Policies and Documents

4.1 This Policy/Procedure should be read in conjunction with the following DEMAT Policies/Procedures:

- DEMAT Code of Conduct
- Managing Allegations Against Staff
- Safeguarding Policy
- Whistleblowing Policy
- Disciplinary Policy

5. Version control

Policy type	DEMAT Trust Policy
Author	Helen Fisher, HR Business Partner
Reviewed by	Helen Rothwell, Director of HR
Release date	October 2025
Review	ANNUAL Policies will be reviewed in line with DEMAT's internal policy schedule and/or updated when new legislation comes into force.
Description of changes	The policy has been reviewed in line with legislation and best practice to provide clarity, greater consistency and support for staff. For further information regarding the specific changes please contact the HR Team at hrteam@demat.org.uk

For all questions in relation to this policy please contact the HR Team at hrteam@demat.org.uk

6 Purpose and Scope

6.1 The purpose of this policy is to supplement the Policy for Managing Allegations against Staff (PMAAS), by outlining how DEMAT will manage any safeguarding allegation made or discovered against any member of staff, contractor or volunteer working on DEMAT premises, which is does not fall within the definition of Allegation contained in PMAAS or

is determined not to do so pursuant to Para 5.2 of PMAAS.

6. Roles and responsibilities

7.1 Colleagues

All colleagues are responsible for being aware of the requirements of PMAAS, which should be consulted before any Low-level concern is reported pursuant to this policy.

7.2 Headteacher

In addition to the responsibilities of a line manager, the Headteacher is responsible for ensuring all staff and adults on the academy site are aware of the policies applicable to them, for encouraging their use and reporting, recording and monitoring the low-level concerns to ensure any trends or patterns related to specific members of staff are identified.

7.3 Director of HR

The Director of HR is responsible for ensuring the monitoring of the low-level concerns is discussed monthly and any concerns around members of staff are dealt with in accordance with this and/or the disciplinary policy.

7.4 Personnel Committee

The Personnel Committee is responsible for reviewing the trust-level low-level concern data, high risk Academies and any individual matters which are reported as of concern.

7.5 Trust Board

The Trust Board is responsible for ensuring the terms of reference of the Personnel and Audit & Risk Committees provide sufficient focus to cover the monitoring and assurance with regard to the implementation of the low-level concern policy.

8 Low-level concerns reporting

8.1 While low-level concerns are, by definition, less serious than allegations, it is recognised that serious safeguarding concerns may begin with low-level concerns, such as subtle grooming by an offender. The Trust will ensure all staff are aware of the importance of recognising concerns before they escalate from low level to serious, wherever possible.

8.2 It is also important to recognise that in order to maintain a strong safeguarding culture, all individuals must be responsible and accountable for their own conduct. As such, reporting low-level concerns will allow individuals to address any inappropriate behaviours by being made aware at an early stage.

8.3 Spotting early signs of harmful behaviour can be difficult, and staff may be hesitant to report concerns they may have over colleagues' behaviour – this may be particularly the case in relation to superiors.

8.4 If staff have a low-level concern as defined above, they are actively encouraged to report their concerns to the Headteacher.

8.5 This should be as soon as is reasonably possible, and within 24 hours of becoming aware of it, if the concern relates to a specific incident.

- 8.6 Concerns about a Headteacher should be reported to the CEO via the Central HR Team (hrteam@demat.org.uk).
- 8.7 As far as possible, the information contained in Appendix 1 should be included as the report and will be known as the 'Low level concern report'.
- 8.8 DEMAT encourages staff to feel comfortable reporting concerns openly as anonymous disclosures are difficult to investigate, but staff can request anonymity when reporting a concern, and this will be considered.
- 8.9 All concerns will be treated confidentially as far as possible, and any party's identity will only be revealed where necessary to investigate the concern, and only to those involved in any investigations.
- 8.10 Staff will be protected from any repercussions where the concern they raise about a third party is a genuinely held belief. If, following further investigation, evidence is provided that a concern has been raised maliciously, the individual making the disclosure may be subject to disciplinary action in line with the DEMAT Disciplinary policy.
- 8.11 Low-level concerns which are reported about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

9 Self-reporting a low-level concern

- 9.1 From time to time, an individual may find themselves in a situation which may appear compromising to others, or which could be misconstrued. Equally, they may reflect on their own behaviour and determine it falls below the standard set out in the Code of Conduct and is therefore reportable as a low-level concern.
- 9.2 These concerns are encouraged as they demonstrate an awareness of the need to achieve the highest standards of conduct and behaviour.

10 Acting on low-level concerns

- 10.1 In the first instance, and throughout the process, the Headteacher/CEO must satisfy themselves that the disclosure is a low-level concern; if at any time they are not satisfied, the disclosure must be reclassified as an Allegation to be dealt with under PMAAS.
- 10.2 If the Headteacher/CEO is in any doubt, they will seek advice from the LADO. This may be on a no-names basis.
- 10.3 The Headteacher will hold a meeting with the individual, the Headteacher may be supported by the DSL/DDSL (Designated Safeguarding Leads/Deputy Designated Safeguarding Leads).
- 10.4 The meeting will follow the outline set out in this policy, will have a written record and provide an opportunity for a conversation around the behaviours and any future expectations. It is expected that in the majority of cases this will be a supportive meeting and allow the individual to respond to

the concern in their own words.

- 10.5 It is unlikely that a low-level concern will result in disciplinary procedure. Where a pattern of behaviour is however identified, it may be dealt with in line with the disciplinary policy. Where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, it will be referred to the LADO and the PMAAS/disciplinary policy will be followed

11 Records of low-level concerns

- 11.1 The low-level concern report itself will be kept confidentially in a central file, which logs all low-level concerns. It will be retained for the duration of the individual's employment with the Trust. This is necessary for any pattern to be identified. A record of the concern will also be kept on the individual personnel file.
- 11.2 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. If the concern is reclassified as an allegation, the guidance contained in the PMAAS regarding references should be followed.
- 11.3 If an individual moves to another role within the Trust, any low-level concern records on their file will be shared with the Headteacher/CEO after the individual is appointed. This is to ensure no member of staff is disadvantaged in applying and being appointed to a new role.

12 Monitoring and review of low-level concerns

- 12.1 The Headteacher/CEO is responsible for reviewing the academy's low-level concern records each month and determining if further action in respect of any individual is required. The review should be undertaken with a second person, ideally independent from the academy, this will be the academy's HR Advisor. Evidence of each review should be kept with the low-level concern records.
- 12.2 The purpose would be to determine if patterns or trends were identified in relation to individuals, or if the concerns began escalating in nature.
- 12.3 The Headteacher/CEO will also ensure sufficient information is reviewed to understand whether wider cultural/behavioural issues are present which would require further training or support to improve. This may be the case where there are several similar concerns raised about several individuals, which would indicate training around those areas or signposting to relevant policies is required.
- 12.4 Each month the number of low-level concerns recorded in each academy will be reported to the CEO via the HR reporting prepared by the Director of HR, including a broad categorisation of the type, so that any wider gaps in training or support can be identified and addressed.
- 12.5 These reports will be made available to the Personnel Committee as relevant, and any action taken under the Disciplinary policy and/or training to address trends will fall within the normal reporting cycle.

Appendix 1 – Low Level concern reporting form

This summarises the minimum information that should be captured to document low-level concerns.

Incident report

Name:

Date/time incident occurred: Date/time incident reported:

Name of person who reported: Outline of incident:

Witnesses (names):

Report action

Disclosed to:

Allegation or low-level concern: Summary reason:

Date of meeting with member of staff: Meeting outcome:

Expected follow up: Date of follow up: