



**The Romero  
Catholic Academy**  
Nurturing the Talent of Tomorrow



## Low-Level concern Policy

|                                |                                                                                     |
|--------------------------------|-------------------------------------------------------------------------------------|
| <b>Responsible for policy:</b> | <b>CC2 Strategy, People and Organisational Development</b>                          |
| <b>Policy Status:</b>          | <b>Safeguarding</b>                                                                 |
| <b>Policy Review:</b>          | <b>Annually</b>                                                                     |
| <b>Chair of Directors</b>      |  |

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**To access the form**

## Definitions

In this **Low-Level concern policy**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Low-Level concern policy** includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer or CEO'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'BDES'** which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the governing body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.

## 1. Purpose

The purpose of this policy is to promote a culture of openness, transparency, and safeguarding vigilance by ensuring that all low-level concerns about adults working with children are identified, recorded, and addressed appropriately.

This policy supports early intervention and helps prevent escalation to more serious safeguarding concerns. This policy should be read in conjunction with the Staff Code of Conduct, which defines expected professional behaviour.

## 2. Legal Framework

This policy is based on and should be read alongside:

- [Keeping Children Safe in Education \(KCSIE\)](#) Keeping Children Safe in Education 2026, as amended or replaced from time to time
- Working Together to Safeguard Children, current statutory guidance
- Data protection legislation, including the **UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and Data (Use and Access) Act 2025**
- Equality Act 2010
- Public Interest Disclosure Act 1998 (Whistleblowing)

## 3. Scope

This policy applies to:

- All staff
- Volunteers
- Contractors
- Agency staff
- Governors/trustees
- Anyone working on behalf of the organisation

## 4. Definition of a Low-Level Concern

A low-level concern is **any concern – no matter how small** – about an adult's behaviour towards a child that:

- Does not meet the harm threshold for referral to the Local Authority Designated Officer (LADO), and
- Is inconsistent with the organisation's Code of Conduct, or
- Creates a sense of unease about the individual's suitability to work with children

Examples may include:

- Being overly familiar with a child
- Favouritism
- Inappropriate communication (including online)
- Poor professional boundaries

## 5. Distinction Between Allegation and Low-Level Concern

### Low-Level Concern

A 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 harm threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

The term “low-level” does not mean that the concern is insignificant. Low-level concerns will be recorded and managed in accordance with the safeguarding procedures set out in this policy.

### Allegation that may meet the harm threshold

The procedures for managing allegations that may meet the harm threshold must be followed where it is alleged that anyone working in the school, including supply staff, volunteers and contractors, has:

- **Harm threshold** - behaved in a way that has harmed a child, or may have harmed a child.
- **Criminal threshold** - possibly committed a criminal offence against or related to a child.
- **Transferable risk threshold** - behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- **Suitability threshold** - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The final criterion includes behaviour that may have occurred outside school and which may make an individual unsuitable to work with children. This is known as transferable risk. Where appropriate, an assessment of transferable risk should be undertaken.

Where a concern may meet the harm threshold, the procedures for managing allegations against adults must be followed and the LADO should be contacted in accordance with local procedures. Where there is any doubt as to whether a concern being considered as low-level may meet the harm threshold, advice should be sought from the LADO

## 6. Reporting Low-Level concerns

### Staff reporting a low-level concern via the Microsoft form on the QR code

All staff must:

- Report concerns **immediately**
- Report to the **Designated Safeguarding Lead (DSL)**

If the concern involves a Governor or DSL/ Principal:

- Report to the **CEO via the Microsoft form on the QR code**

### **Self-reporting via the Microsoft form on the QR code**

Staff are encouraged to report concerns about their own behaviour where they may have:

- Acted in a way that could be misinterpreted
- Breached professional boundaries

### **Reporting a low-level concern relating to a member of supply staff or contractor via the Microsoft form on the QR code**

- Where a low-level concern relates to a member of supply staff or a contractor, the concern will also be notified to their employer so that any potential patterns of inappropriate behaviour can be identified.

## **7. Recording concern**

All low-level concerns must be captured in the Microsoft form. The QR code is here:



## **8. Managing Low-Level concerns**

The DSL will review all low-level concerns and ensure that the Principal is informed in a timely manner, having regard to the nature of the concern. The Principal will be the ultimate decision-maker in respect of low-level concerns within the school, working collaboratively with the DSL and seeking advice from the MAC safeguarding lead, HR and/or the LADO where appropriate.

Where patterns of behaviour emerge:

- Further action may be taken
- Escalation may occur
- Where there is any doubt as to whether a concern meets the harm threshold, advice will be sought from the LADO.
- The CEO with Head of HR will maintain oversight of all low-level concerns across the MAC. Records will be reviewed regularly to identify patterns, themes or repeated behaviours. Where a pattern is identified, consideration will be given not only to action in relation to the individual, but also to whether wider cultural, systemic or practice issues contributed to the behaviour and whether changes to policy, training, supervision or organisational practice are required.

## **9. Storage and data protection**

All records will be:

- Held securely and confidentially
- Accessible only to authorised personnel

Personal data will be processed in line with:

- UK GDPR
- Data Protection Act 2018

**Lawful Basis:**

- Legal obligation
- Safeguarding and protection of children (vital interests)

Records will be stored within the academy's central safeguarding recording system (e.g. CPOMS Staff safe for Secondary or HR secure system)

## 10. Retention of Records

Low-level concern records will:

- Records will be retained in line with national safeguarding and personnel record retention schedules. KCSIE says schools determine how long they retain such information but recommends that it is retained **at least until the individual leaves their employment**.
- Normally be reviewed when an individual leaves the organisation
- Be retained longer where necessary for safeguarding risk or legal reasons

## 11. References

- KCSIE 2026 says only substantiated safeguarding concerns/allegations, including a group of low-level concerns, **that meet the harm threshold** should be provided as safeguarding information in references.
- A low-level concern should not be included unless it relates to something that would normally be included in a reference, such as misconduct or poor performance

## 12. Creating a safe culture

The organisation will:

- Promote a culture of openness and trust
- Ensure staff feel confident to report concerns
- Provide regular safeguarding training
- Reinforce professional boundaries

Leaders will:

- Model appropriate behaviour
- Take all concerns seriously
- Respond consistently and fairly

### 13. Links to other policies

This policy should be read alongside:

- Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Disciplinary Policy
- Safer Recruitment Policy

### 14. Monitoring

This policy will be:

- Reviewed **annually**
- Updated in line with legislative and statutory guidance changes
- Monitored by **CC2 Strategy, People and Organisational Development**

### 15. Links to Diocese

#### HR and Communications

The following people can be contacted at The Archdiocese of Birmingham (Cathedral House):

- [communications@rcaob.org.uk](mailto:communications@rcaob.org.uk)
- 0121 230 6286

## Appendix 1 Low-Level Concern Reporting Form

### **Confidential – Safeguarding Document**

This form must be completed for any low-level concern regarding an adult working with children. All information will be handled in accordance with UK GDPR and safeguarding requirements.

You should provide a concise record – 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 and emailed to the CEO via [HR@romeromac.com](mailto:HR@romeromac.com). The CEO will have oversight of any submitted forms. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

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 individual may have acted in a way.

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is 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 school or college may have acted in a way that:

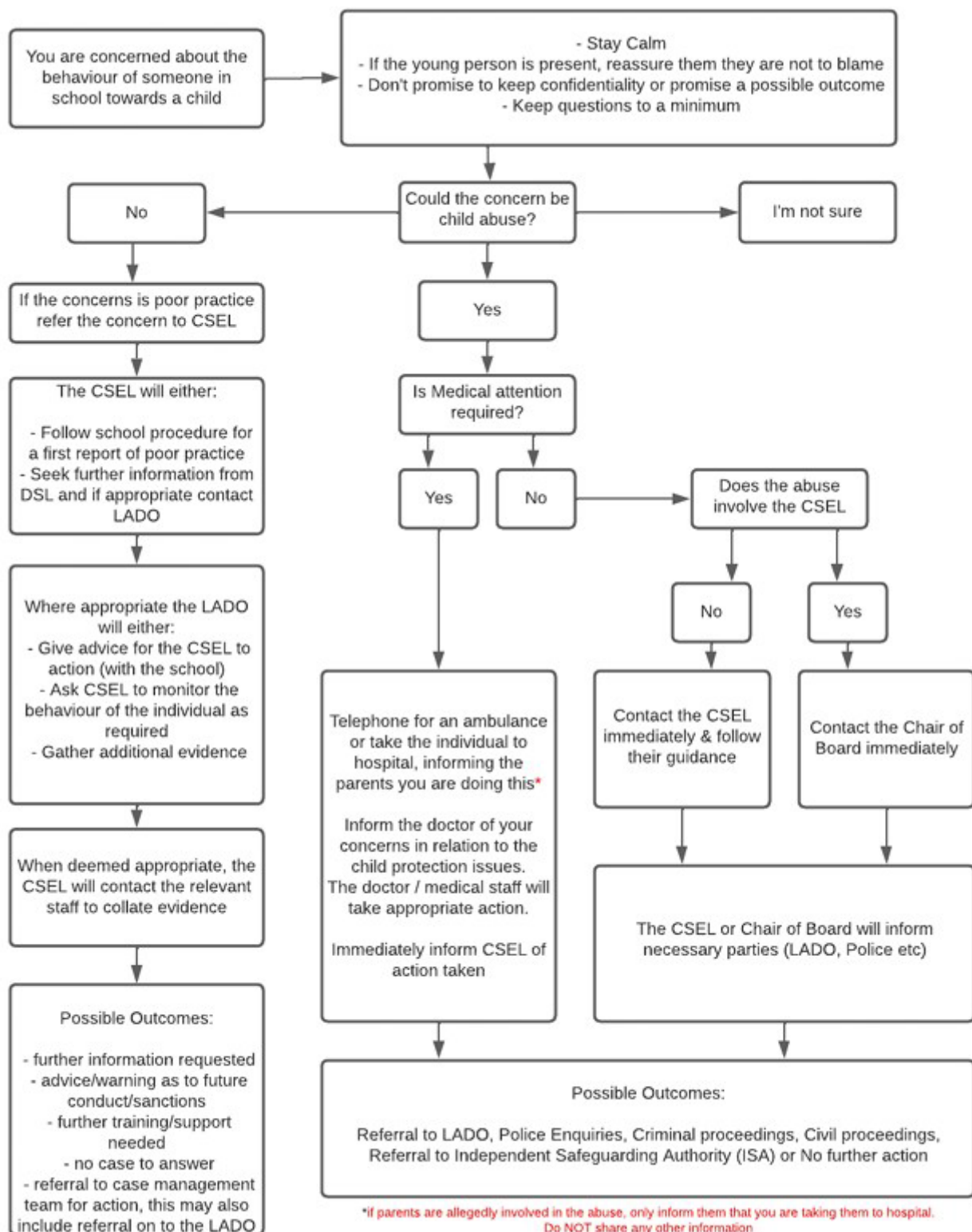
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.



| Section 1: Person Raising the Concern                                                     |                                                                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name                                                                                      |                                                                                                                                                                                                                                           |
| Role/position                                                                             |                                                                                                                                                                                                                                           |
| Contact details                                                                           |                                                                                                                                                                                                                                           |
| Date of report                                                                            |                                                                                                                                                                                                                                           |
| Section 2: Individual of Concern                                                          |                                                                                                                                                                                                                                           |
| Name                                                                                      |                                                                                                                                                                                                                                           |
| Role/position                                                                             |                                                                                                                                                                                                                                           |
| Relationship to organisation (e.g. staff, volunteer, contractor):                         |                                                                                                                                                                                                                                           |
| Section 3: Details of the Concern                                                         |                                                                                                                                                                                                                                           |
| Please provide a clear, factual account of the concern.                                   |                                                                                                                                                                                                                                           |
| Date of incident                                                                          |                                                                                                                                                                                                                                           |
| Time                                                                                      |                                                                                                                                                                                                                                           |
| Location                                                                                  |                                                                                                                                                                                                                                           |
| Section 4: Context and Additional Information                                             |                                                                                                                                                                                                                                           |
| Were there any witnesses?                                                                 | <input type="checkbox"/> Yes <input type="checkbox"/> No<br>If yes, provide names:                                                                                                                                                        |
| Has this behaviour happened before (to your knowledge)?                                   | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure                                                                                                                                                  |
| Does this concern relate to:                                                              | <input type="checkbox"/> Professional boundaries<br><input type="checkbox"/> Communication (including online/social media)<br><input type="checkbox"/> Conduct outside of work<br><input type="checkbox"/> Other (please specify):        |
| Section 5: Immediate Action Taken                                                         |                                                                                                                                                                                                                                           |
| Have you taken any action already?                                                        | <input type="checkbox"/> Yes <input type="checkbox"/> No<br>If yes, please detail:                                                                                                                                                        |
| Section 6: Risk Assessment (Initial View)<br>(Complete if appropriate – DSL will confirm) |                                                                                                                                                                                                                                           |
| Do you believe:                                                                           | A child may be at risk of harm?<br><input type="checkbox"/> Yes <input type="checkbox"/> No<br>This may meet the threshold for LADO referral?<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure |
| Section 7: Declaration                                                                    |                                                                                                                                                                                                                                           |
| I confirm that:                                                                           | <ul style="list-style-type: none"> <li>The information provided is accurate to the best of my knowledge</li> <li>I understand this concern will be handled confidentially and in line with safeguarding procedures</li> </ul>             |
| Signature                                                                                 |                                                                                                                                                                                                                                           |
| Date                                                                                      |                                                                                                                                                                                                                                           |



\*If parents are allegedly involved in the abuse, only inform them that you are taking them to hospital. Do NOT share any other information

(Using Lucid App)

Key: CSEL/ CEO