

WHITGIFT SUMMER SCHOOL

LOW-LEVEL CONCERNS POLICY

Introduction

Whitgift Summer School understands its responsibility to create a positive culture in which concerns, no matter how small, can be identified and spoken about openly. This is considered a key element of a strong safeguarding culture that everyone endorses and is committed to. This policy seeks to create awareness of what is considered inappropriate, problematic or concerning behaviour of those working with children and to enable the early identification and prompt and appropriate management of concerns.

In accordance with the School's ethos and values as well as the whole school approach to safeguarding, the School promotes an open, trustful and transparent culture in which all safeguarding concerns and allegations about adults working with children and young people are shared responsibly and with the right person and dealt with promptly and appropriately. This includes self-reporting as appropriate.

It is advised that this policy is read alongside:

- Whitgift Summer School Safeguarding and Child Protection Policy
- Whitgift Summer School Staff Code of Conduct (found in the Staff Handbook)
- Whistleblowing Policy (John Whitgift Foundation policy)

Whitgift Summer School recognises the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Scope

This policy applies to all staff working in or on behalf of the School, including supply teachers, contractors, and volunteers. It also includes anyone who is part of the School's Governing Body.

Aims

The policy aims to:

- ensure that there is a formal mechanism for sharing, recording and handling low-level concerns
- empower staff to share any low-level concerns, to self-refer and to help staff to interpret the sharing of such concerns as a neutral act
- address possible unprofessional behaviour and support the individual to correct it at an early stage
- identify possible inappropriate, problematic or concerning behaviour – including any patterns – that may need to be consulted upon with, or referred to, the Local Authority Designated Officer (LADO)
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- continue to improve the School's safeguarding system and procedures.

Definition of Low-Level Concerns

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease of a “nagging doubt” – that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the standards and values of the School, and which does not meet the School’s expectations encapsulated in policies such as the Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

The term ‘low-level’ concern does not mean that the concern is insignificant but is used as a clear and comprehensible name to neutralise the act of sharing a concern.

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

- being overly friendly with students
- having favourite students
- taking photographs of children on their mobile phone
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- engaging in unprofessional interaction with another adult
- humiliating students
- intimidation, punishment or degrading treatment
- using inappropriate language that is sexual, profane, intimidating or offensive
- being ‘friends’ with students on social media.

Concerns may arise in several ways and from a number of sources including:

- 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.

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Sharing Low-Level Concerns

Safeguarding and promoting the welfare of children is the responsibility of everyone working in and for the School and the sharing of low-level concerns should be seen as a neutral act. Whitgift Summer School encourages all staff to share confidentially any low-level concerns so that they can be addressed appropriately.

Low-level concerns should be shared with the Course Director or the Welfare Manager/Designated Safeguarding Lead, or in their absence the Deputy Designated Safeguarding Lead as soon as reasonably possible and, in any event within 24 hours of becoming aware of it - although it is never too late to share a low-level concern.

The Course Director or the Welfare Manager/Designated Safeguarding Lead will inform the Headmaster in a timely fashion according to the nature of the particular

low-level concern.

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

The Croydon LADO office (Jane Rowe) can be contacted via email at LADO@croydon.gov.uk.

Self-Reporting of a Low-Level Concern

Occasionally, a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- Crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The School aims to create an environment where staff are encouraged and feel confident to self-refer.

Procedure for Reporting Low-Level Concerns

Staff have the option of sharing their low-level concern verbally with the relevant individuals stipulated within this policy in the first instance, or of providing them with a written or electronic summary of it by email.

Where the low-level concern is made verbally, the recipient must make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgment in determining what information is necessary to record for safeguarding purposes.

The following details should always be included:

- the name of the individual sharing the low-level concern and their role;
- the name of the individual about whom the concern is being raised and their role;
- 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).

If the individual about whom the concern is being raised has an opposing factual view of the incident, the recipient of the concern should record this. The record should be signed, timed and dated.

Responding to Low-Level Concerns

All low-level concerns, including those raised by a third party, should be responded to in a sensitive and proportionate way. HR advice will be taken as appropriate.

The Course Director will use the information collected to categorise the type of behaviour and determine any further action, in line with Whitgift Summer School's Staff Code of Conduct. The Course Director will be the ultimate decision-maker in respect of all low-level concerns, though he may wish to collaborate with the Welfare Manager/ Designated Safeguarding Lead or Director of International Education.

If the concern is raised via a third party, the Course Director or the Welfare Manager/Designated Safeguarding Lead will collect evidence where necessary by speaking:

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

Once the Course Director and the Welfare Manager/Designated Safeguarding Lead or the Director of International Education have what is believed (by the person raising it) to be a low-level concern, they should follow the steps detailed below, though not necessarily in order, and according to the nature of the concern.

(a) Speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether there is a written summary.

(b) Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

(c) Speak to 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).

(d) Review the information and determine whether:

- the behaviour is in fact appropriate – i.e. entirely consistent with the Staff Code of Conduct and the law,
- the behaviour constitutes a low-level concern,
- the behaviour constitutes a low-level concern and merits consultation with the LADO,
- the behaviour **may** meet the harm threshold, and must be referred to the LADO, or other relevant external agencies

- when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour **may** meet the harm threshold and must therefore be referred to the LADO or other relevant external agencies.

Recording and Reviewing Low-Level Concerns

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. The Welfare Manager/Designated Safeguarding Lead will maintain a secure, confidential log of all low-level concerns with access restricted to a clearly defined group in line with the Data Protection Act 2018 and UK GDPR.

Records will be reviewed by the Course Director and Welfare Manager/Designated Safeguarding Lead so that potential patterns can be identified.

Data protection and confidentiality

Whitgift Summer School will always respect the personal data of staff (and others, where they may be identifiable) in implementing this policy and in keeping records of low-level concerns secure. All personal data processed in connection with low-level concerns will be processed in accordance with data protection legislation, the JWF Data Protection Policy and the School's privacy notices and data protection policies.

The Data Protection Act 2018 permits to process even the most sensitive personal data where necessary for the purposes of protecting children from harm even though low-level concerns will not always involve sensitive categories of data.

A proportionate approach must be taken by all to considering what personal data is in fact necessary to share and record by way of low-level concerns in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms.

Anonymity

Staff are encouraged to consent to be named when sharing low-level concerns as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the School will respect that person's wishes as far as possible. However, there may be circumstances where the staff member who raises the concern will need to be named and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

Retention

Low-level concerns will be retained securely by the School for 7 years, after employment ceases, for safeguarding purposes, as outlined in the Foundation Policy, unless the School is required to retain for a specific period by law

Data Access Request

Under the data protection law, all staff are entitled to ask to see the content of any low-level concerns retained by Whitgift Summer School as it relates to them personally and to make reasonable objections as to the fairness or accuracy of that content. The School will process such request within the period described by law, subject to any necessary protection of the rights of third parties and unless any other relevant exemptions apply.

References

Date Protection law and best practices mean that the School and Whitgift Summer School must not refer to unsubstantiated, malicious or false allegations in references.

The School will not include low-level concerns in employment references unless:

- the concern (or group of concerns) has/have met the threshold for referral to the Local Authority Designated Officer and is/are found to be substantiated;
- the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

The Role of the Governors

In supporting the governors of the John Whitgift Foundation to fulfil their responsibility to oversee safeguarding and to ensure that there are procedures in place to manage any safeguarding concerns, the Headmaster, Senior Deputy and the Director of Safeguarding/DSL will regularly inform them about the implementation of the Low-Level Concerns Policy and any evidence as to its effectiveness.

The Foundation governors verify with the safeguarding governor that they have oversight of low-level concerns and may ask to review an anonymised sample of low-level concerns, in order to ensure that these concerns have been responded to promptly and appropriately.

Reviewed by The Director of International Education: November 2025

Next review: November 2026