

**Low Level
Concerns and
Allegations of
Abuse Against Staff
February 2026**

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INTRODUCTION

The purpose of the Romero Catholic Academy Trust's Low-Level Concerns and Allegations of Abuse Against Staff Policy is to foster a culture of transparency, trust, and safeguarding, ensuring the safety and well-being of all pupils while maintaining the highest standards of professional conduct.

This policy is applicable to all staff employed by Romero Catholic Academy Trust including a supply teacher, volunteer or contractor and relates to behaviours whilst in work and outside of work which may cause reason for concern.

This policy reflects the Trust's commitment to safeguarding children in line with the teachings of the Catholic faith, ensuring a safe, respectful, and nurturing environment across all academies within the Trust.

Early identification of concerns can also assist the school in identifying patterns or trends which may mean that additional staff training is needed. It may well be that the actions are unintentional, however, we must maintain a culture that 'it could happen here.'

USING THIS POLICY

This policy applies to low-level concerns **and** allegations that may meet the harm threshold.

Section 1 is for allegations that may meet the harm threshold

Section 1 applies to all cases in which it is alleged that 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

Section 2 is for low-level concerns

Section 2 applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1.

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 designated officer at the local authority

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

WHO TO REPORT AN ALLEGATION TO

The Employee	The Case Manager
Allegation made against:	Allegation must be reported to:
CEO/CSEL	Chair of Board of Directors
Executive Team (excluding CEO/CSEL)	CEO/CSEL
Central Team employee	CEO/CSEL
Executive Headteacher/Headteacher/Head of School	CEO/CSEL
Teacher	Headteacher
School Support staff	Headteacher

The 'case manager' will lead any investigation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO (respective to the appropriate Local Authority).

REPORTING A CONCERN

We expect all schools within our Romero Catholic Academy Trust to follow the same procedures, whilst we recognise that each school has a different context, with Safeguarding it is important that we centralise all aspects of reporting, recording and monitoring.

Any member of staff, student parent or other person can make a low-level concern report and the process for doing this must be made available to staff and students alike.

Any concerns should be reported to the head teacher of the school, ideally using the proforma (appendix A) however, reports can be made verbally or via other means such as letter or email. In those cases, it is the responsibility of the head teacher to record this appropriately including action taken and rationale for decision making.

Headteachers should always be informed about low-level concerns and should be the ultimate decision maker in respect of all low-level concerns. This is so that if there are patterns that other staff may not be aware of, it can be addressed by one recipient and ensure that no problematic or concerning behaviour is lost. However, it may be appropriate to delegate fact finding to a DSL, Deputy Headteacher or relevant Senior Member of Staff.

Headteachers should maintain an atmosphere of openness with the Trust Head of Safeguarding within the Central Team and seek to inform and/or ask if there are any concerns in relation to low-level concerns that they are unsure about. They do not need to divulge the name

of the member of staff for whom the concern is about. If in doubt about whether it meets threshold or not, they should seek advice from the local authority designated officer (LADO).

PROCEDURES IN SCHOOL IF STAFF WISH TO REMAIN ANONYMOUS.

If the member of staff who raises the concern does not wish to be named, then the organisation should respect that person's wishes as far as possible.

We would hope that our organisational culture is strong enough that staff do speak to the Headteacher in person and do not put in anonymous concerns about their colleagues. It is imperative that we recognise that safeguarding is everyone's responsibility and by creating a culture where staff are not afraid to share, we can ensure our code of conduct is constantly lived, monitored and reinforced by all staff.

There may be times when the member of staff who raised the concern will need to be named, and anonymity can never be promised.

TIMELY ACTION

It is imperative that allegations against staff are dealt with as promptly as possible to:

- minimise the risk to the child
- minimise the impact on the child's academic progress
- minimise stress to the employee concerned
- ensure a fair and thorough investigation for all parties.

To enable this to happen, all staff, parents, and students should be aware of the procedures set out in this policy.

SELF-REFERRAL

An individual may have found themselves in a situation that could be misinterpreted, might appear comprising to others and/or on reflection believe they may have behaved in a way that falls below the expected standards. In these circumstances, self-reporting is encouraged and is seen as an important means of maintaining the highest levels of safeguarding for children. Self-referral demonstrates self-awareness of the individual's own actions, or how they may be perceived, and an awareness of the behavioural standards expected by all staff.

AGENCY/SUPPLY WORKERS/CONTRACTORS

If the concern relates to an adult working in the school but is employed by a supply agency or contractor, the concern should be reported to the Headteacher in the usual way. The Headteacher will inform the employer.

MONITORING AND REVIEW

This policy will be reviewed every two years.

SECTION 1: ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that 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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO) (respective to the appropriate Local Authority).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

SUSPENSION OF THE ACCUSED UNTIL THE CASE IS RESOLVED

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

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the [local authority/academy trust]

If in doubt, the case manager will seek views from the Romero CAT HR Team and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

DEFINITIONS FOR OUTCOMES OF ALLEGATION INVESTIGATIONS

- 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 that supports the allegation being made

PROCEDURE FOR DEALING WITH ALLEGATIONS

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below (Fact Finding)
- Discuss the allegation with 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 local authority 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 after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority 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 appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- 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 local authority children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. 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 designated officer 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 designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- 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 local authority 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
- 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)

EXTERNAL AGENCY INVESTIGATION

Where the LADO or other external agency such as the police pursue an investigation, the school should wait to start an internal investigation until the external investigation has concluded, unless advised otherwise by the LADO or external agency. The school should cooperate fully with any external investigation.

Under no circumstances should the school initiate an internal management or disciplinary investigation into an allegation against a member of staff or volunteer until a consultation has taken place with the LADO. This includes, for example, interviewing witnesses, victims or the accused member of staff. This could jeopardise a criminal investigation or conviction being secured.

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.

INTERNAL INVESTIGATION

The case manager will consult with the HR Lead, and the Safeguarding Lead prior to reaching a decision on when and how to proceed with an internal investigation. In addition, the case manager must seek advice from the LADO in all cases if the safeguarding of children's welfare remains an issue within the school.

The investigation will be undertaken in accordance with the school's disciplinary procedure in order to establish if there is a case to answer. The school will seek advice from the HR Lead on

how to conduct and set out an investigation, including who to appoint as the Investigating Officer.

Evidence derived from any external child protection investigation or criminal investigation (e.g. statements, exhibits) may be available for use in subsequent disciplinary proceedings, particularly where the witnesses are the same. If access is sought to such material a formal application should be made via the LADO in line with the any agreed local protocol.

Whether it is appropriate to include students as witnesses to these internal disciplinary procedures will depend on their age, understanding and capability.

On receipt of the report of the disciplinary investigation, the Headteacher should then decide whether to convene a disciplinary panel hearing.

If a decision is taken to proceed with a disciplinary hearing, the employee should be informed in writing, as required under the disciplinary procedure. It is advisable to confirm this position in a meeting with the employee and their representative.

If a decision is taken not to proceed with a disciplinary hearing, the employee should be invited to a meeting, accompanied by their union representative or workplace colleague, to explain the circumstances of the decision. This decision should be confirmed in writing.

Those involved in the investigation of the complaint or the continuing management of the situation at the school cannot hear consequent disciplinary cases or appeals, since they may receive information that may prejudice a fair hearing of the complaint.

SUPPORT FOR THE EMPLOYEE

- 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.
- The employee will be encouraged to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to Employee Assistance Programme or medical advice.
- The employee may need other additional support, particularly where they are suspended, and the school will consider what might be appropriate to best accommodate this.
- A nominated representative of the school will keep the employee informed of the progress of the case and any other work-related issues.
- If the employee is suspended from duty, social contact with work colleagues and friends will not be prevented unless there is evidence to suggest that this may prejudice the gathering of evidence.

REFERRALS

We will 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

For schools with Early Years, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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.

ADDITIONAL CONSIDERATIONS FOR SUPPLY TEACHERS AND ALL CONTRACTED STAFF

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.

TIMESCALES

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 3 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.

RESIGNATION

If an employee resigns when an allegation has been made against them or during an investigation, the investigation will continue, making every effort to reach a conclusion, with or without the employee's cooperation. However, the employee will still be given full opportunity to answer the allegation.

Settlement agreements will not be used in situations which are relevant to safeguarding or child protection procedures.

SPECIFIC ACTIONS

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 local authority 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.

The case manager will also consider how best to manage the individual's contact with the child or children 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 local authority 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 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 local authority 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

CONFIDENTIALITY AND INFORMATION SHARING

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 local authority children's social care services, as 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 a 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

RECORD-KEEPING

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 local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

REFERENCES

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 that 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

LEARNING LESSONS

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO 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.

NON-RECENT ALLEGATIONS

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.

SECTION 2: CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

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.

DEFINITION OF LOW-LEVEL CONCERNS

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 designated officer at the local authority

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

SHARING LOW-LEVEL CONCERNS

Low-level concerns about a member of staff should be reported to the Headteacher. If the concern is about the Headteacher, the concern should be shared with the Education Director.

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must

remember that the welfare of the child is paramount and they must therefore report their concerns immediately.

If a staff member makes a referral about another member of staff which is malicious or vexatious they may be subject to investigation under the disciplinary procedure.

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:

- 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 per section 7.7 of this policy
- Empowering staff to self-refer
- 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

RESPONDING TO LOW-LEVEL CONCERNS

If the concern is raised via a third party, the headteacher 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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school/Trust Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

THE PROCESS FOR THE HEADTEACHER TO FOLLOW

The Headteacher will:

- Determine whether the behaviour is:
 - consistent with the code of conduct, the law and/or professional standards
 - a low-level concern
 - serious enough to need to be referred to the LADO
 - part of a pattern that means the low-level concern should be reclassified and referred to the LADO
- If appropriate, seek advice from the LADO on a 'no names' basis
- Unless advised otherwise by the LADO, the Headteacher will collect as much evidence as possible through:
 - Talking directly to the person that raised the concern

- Talking to the subject of the concern
- Talking to any witnesses
- Consider whether the issue raises conduct or capability issues
- Consult with the DSL if appropriate (for example, if a collaborative decision making approach is necessary)
- Consult with HR if appropriate (on a no-names basis if necessary)
- Determine the appropriate action

RECORD KEEPING

All low-level concerns should be recorded in writing in a central record by the Headteacher. The record will include:

- Details of the concern
- The context in which the concern arose
- Action taken
- Rationale for the decision
- Name of the individual reporting the concern. (Anonymity will be respected as far as reasonably possible)
- Date

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.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the 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 harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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.

REFERENCES

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

APPENDIX A:

REPORTING A CONCERN

Please use this form to share any low level concern, or allegation against a member of staff, no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’.

An allegation against a member of staff applies to all cases in which it is alleged that 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

A low-level concern does not meet the harm threshold set out above.

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 designated officer at the local authority

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

You do not need to determine if this is an allegation of harm or a low-level concern, This is for the Headteacher/CEO to decide.

You should provide a concise record (online/electronically or hard copy) – including brief context in which the concern arose, and details which are factual, 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.

Name of staff member who the concern relates to:	Department and role if known.
Details of concern:	

Signed:	Date and Time:
Name:	

Name of person receiving the concern:	Date and time:
Actions taken:	
Signed:	Date and time:
Name:	

This record will be held securely in accordance with Romero CAT's low-level concerns and allegations against staff policy. Please note that this will be treated in confidence as far as possible, but Romero CAT 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.

APPENDIX B

FACT-FINDING TEMPLATE

(For use by Headteachers prior to contacting the LADO – not for investigation)

SECTION 1: RECEIPT OF ALLEGATION

Item	Detail
Date & time allegation received	
Method of receipt	(e.g., phone, email, in person)
Name & role of person reporting	
Relationship to school/child	

SECTION 2: DETAILS OF ALLEGATION

Item	Detail
Date(s) of Incident(s)	
Time(s) of Incident(s)	
Location(s) of Incident(s)	
Nature of allegation	(e.g., physical harm, sexual misconduct, inappropriate language)
Description of allegation (Verbatim where possible, entirely factual)	

SECTION 3: INDIVIDUALS INVOLVED

Item	Detail
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Staff member (name and role)	
Witnesses (name and role)	
Child(ren) name(s)	

SECTION 4: IMMEDIATE RISK ASSESSMENT

Item	Detail
Is the child/other children at ongoing risk?	
Actions taken to safeguard: (e.g., child moved, increased supervision)	
Is suspension or redeployment being considered?	

SECTION 5: THRESHOLD CHECK (KCSIE)

Does the allegation suggest:	Response
Harm or potential harm to a child?	
Possible criminal offence?	
Risk to children or unsuitability to work with them?	

If YES to any, contact LADO immediately. Do not progress with any further investigation.

SECTION 6: INTERNAL NOTIFICATIONS

Notification to:	Date and time complete:
Romero Catholic Academy Trust Head of Safeguarding	
Romero Catholic Academy Trust Head of HR	
DSL	

Complete Concerns Log	
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SECTION 7: PREPARATION FOR LADO CONTACT

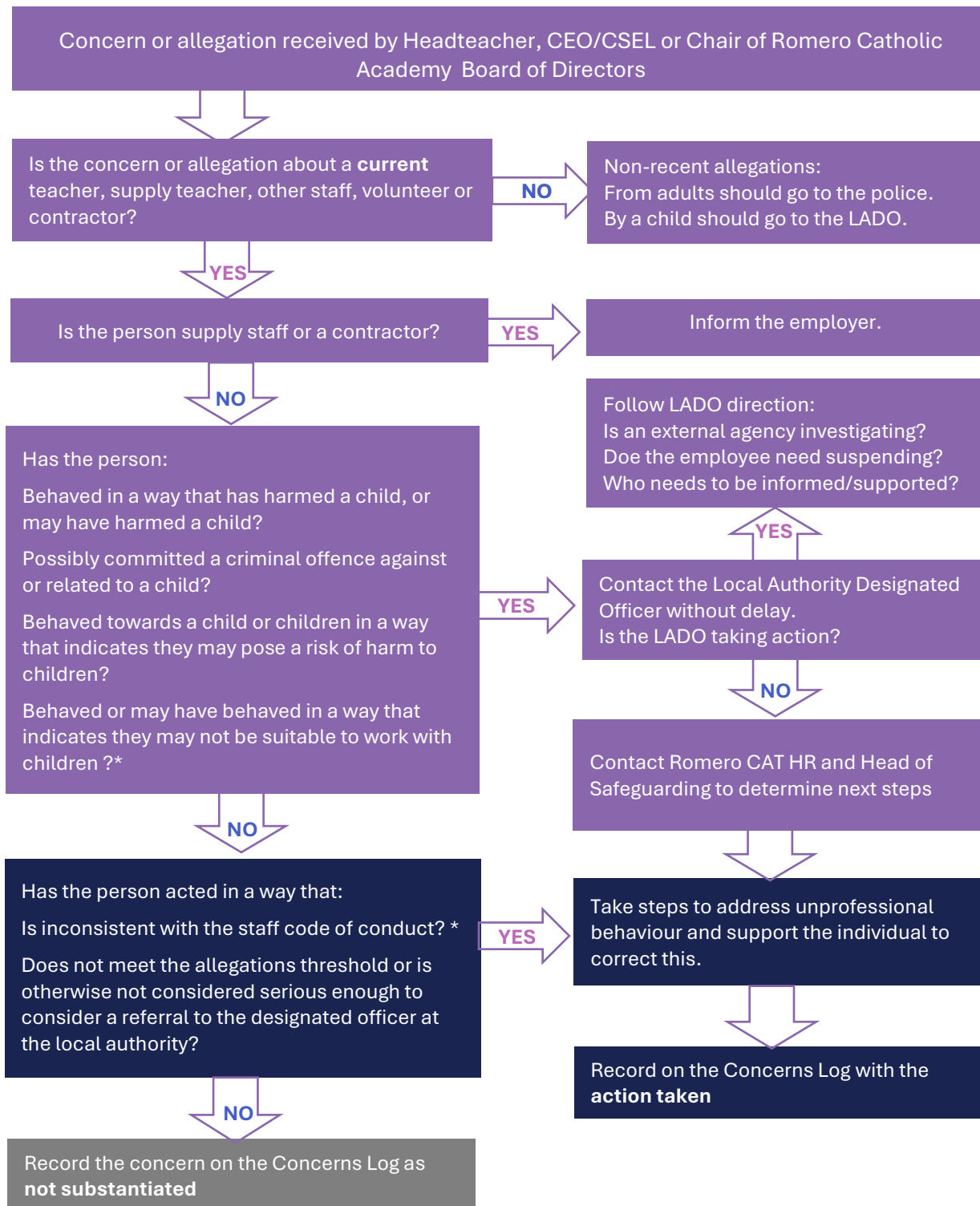
Item	Detail
Summary of facts gathered	
Supporting documents: (chronology, safeguarding logs)	
Questions for LADO	
Deadline for LADO contact	
Further internal actions (paused until LADO advice received)	
Next steps	

APPENDIX C

Low Level Concerns Log – template log available on the Romero Central Portal



APPENDIX D



*This includes behaviour taking place both inside and outside of school