Catch22 Policy

Low Level Concerns

Policy owner:	Catch22 Head of Safeguarding
Local accountable officer:	Headteacher
Queries to:	Catch22 Head of Safeguarding
Date created:	August 21
Date of last review:	September 26
Date of next review:	September 27
Catch22 group, entity, hub:	Catch22 Education
4Policies level (all staff or managers only)	All Education Staff

This policy will be reviewed annually

Catch22 reserves the right to amend this policy, following consultation, where appropriate.

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Catch 22 Independent Schools
Education Intent Statement

Catch22's Vision:
To deliver better social outcomes through transforming public service through the 3Ps:

Place
Supporting people to find, retain, transition safely into homes and communities

Purpose
Working with people to achieve their purpose in education, employment or training

People
Building networks of people around individuals

Our Education Mission:

To enable young people to progress and succeed in sustained education, training or employment.

We do this through engaging young **people** positively with their **purpose** through learning and future life aspirations. All our pupils achieve positive outcomes, thrive and enjoy a quality education that is delivered by skilled, passionate **people** with high expectations in a **place** that is safe, high quality and appropriate.

Our schools cater for young people aged 4-16 who are outside of mainstream education, many of whom have troubled and challenging backgrounds. We embody our vision in all we do to ensure our pupils are supported fully to achieve these goals.

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1. What is the policy about?

This policy sets out how concerns about the behaviour of an adult working in or on behalf of the school, which do not meet the harm threshold, will be shared, recorded and responded to. These are referred to as low-level concerns.

A low-level concern does not mean that the behaviour is insignificant. It means that the concern does not currently meet the harm threshold for an allegation. Staff are encouraged to share any concern, no matter how small, including concerns about their own behaviour, so that these can be considered appropriately and any emerging patterns identified.

This policy should be read alongside the Catch22 Schools Safeguarding Policy, Staff Code of Conduct and current Keeping Children Safe in Education (KCSIE) statutory guidance.

2. Who does this policy apply to?

This policy applies to all adults working in or on behalf of Catch22 Education schools, including employees, senior leaders, agency and supply staff, contractors, volunteers and any other adults who have contact with pupils through their work with the school.

The principles of this policy apply regardless of an individual's role or level of seniority. All staff and other adults working in or on behalf of the school are expected to understand and follow the arrangements for identifying and reporting low-level concerns.

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3. Purpose

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the values and standards of behaviour set out in the Staff Code of Conduct are understood, lived, monitored and reinforced.

To achieve this purpose, Catch22 Education will:

- ensure that staff are clear about, and confident in distinguishing, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, including understanding professional boundaries and reporting arrangements;
- encourage and empower staff to share low-level concerns, including concerns about their own behaviour, and to understand that raising a concern is a responsible and protective action;
- address unprofessional or inappropriate behaviour at an early stage and support individuals to understand and correct their behaviour where appropriate;
- identify concerning, problematic or inappropriate behaviour, including patterns of behaviour, which may require further action, consultation with or referral to the Local Authority Designated Officer (LADO);
- ensure concerns are handled promptly, sensitively, fairly and proportionately;
- use learning from individual concerns and patterns of concerns to identify and address any weaknesses in safeguarding practice, systems, training or organisational culture; and
- ensure concerns are shared as soon as possible and without unnecessary delay. Where there is uncertainty about whether a concern meets the harm threshold, it must be reported immediately so that an appropriate decision can be made.

4. Definitions

Appropriate conduct

Appropriate conduct is behaviour which is consistent with the Catch22 Staff Code of Conduct, safeguarding expectations, professional boundaries and the law.

Concerns or allegations that may meet the harm threshold

A concern or allegation may meet the harm threshold where it is alleged that a person working in or on behalf of the school has:

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

Concerns which may meet the harm threshold must be managed in accordance with the school's safeguarding procedures and current Keeping Children Safe in Education guidance.

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Low-level concern

A low-level concern is any concern, no matter how small, including a sense of unease or 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 Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not considered serious enough to require referral to the Local Authority Designated Officer (LADO).

The term "low-level" does not mean that the behaviour is insignificant. It means that the concern does not currently meet the harm threshold.

Examples of behaviour which may constitute a low-level concern include, but are not limited to:

- being overly friendly with a child or children;
- showing favouritism towards particular children;
- taking photographs of children using a personal mobile phone or device contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door where this is not appropriate or authorised;
- humiliating, intimidating or speaking inappropriately to a child;
- using inappropriate language, communication or physical contact;
- behaving in a way that is inconsistent with expected professional boundaries; or
- inappropriate conduct outside work which raises safeguarding or suitability concerns.

Staff are not expected to determine whether a concern is a low-level concern or whether it meets the harm threshold before reporting it. Where there is any doubt, the concern should be reported promptly through the school's safeguarding procedures so that the appropriate determination can be made.

5. Recording concerns

All low-level concerns should be shared as soon as possible and without unnecessary delay. Staff are not expected to determine whether a concern is a low-level concern or whether it may meet the harm threshold before reporting it.

In the first instance, a member of staff should report their concern to the Designated Safeguarding Lead (DSL) for their site. The DSL will ensure that the concern is reported promptly to the Headteacher.

Where the concern relates to a DSL, the member of staff should report the concern directly to the Headteacher.

Where the concern relates to the Headteacher, it should be reported directly to the Executive Headteacher.

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Staff are encouraged to self-report where they believe their own behaviour may have fallen below the standards expected in the Staff Code of Conduct or could be misunderstood or perceived as inappropriate.

The concern should be recorded clearly and factually. The record should include:

- the name and role of the person raising the concern;
- the name and role of the adult about whom the concern has been raised;
- the context in which the concern arose;
- a concise, chronological and accurate account of the behaviour or incident;
- the date and time of the incident, where known; and
- the date and time the concern was reported.

The Headteacher will ensure that low-level concerns are formally recorded on StaffSafe and that subsequent decisions, actions and the rationale for those decisions are appropriately recorded.

Low-level concerns received by the Headteacher will be discussed with the Catch22 Head of Safeguarding, normally as part of the scheduled weekly safeguarding meeting. This provides additional safeguarding oversight, supports consistency in decision-making and enables consideration of any emerging patterns or wider safeguarding implications.

Where a concern relates to the Headteacher, references in Section 6 to actions or decisions by the Headteacher will instead apply to the Executive Headteacher, working with the Catch22 Head of Safeguarding and People Partner as appropriate.

Concerns should be handled confidentially and information shared only with those who need it for safeguarding, management or employment purposes.

6. Responding to a concern

On receiving a concern, the Headteacher will review the information available and, where necessary, gather sufficient further information to understand the circumstances. This may include speaking with the person who raised the concern, the adult about whom the concern has been raised and any relevant witnesses. Where advice has been sought from the LADO or another external agency, the Headteacher will take account of that advice before speaking to the individual concerned or taking any action which could compromise a subsequent safeguarding or other investigation.

The Headteacher will determine whether the behaviour:

- is consistent with the Staff Code of Conduct and does not require further safeguarding action;

- constitutes a low-level concern;

- may meet the harm threshold and requires advice from or referral to the Local Authority Designated Officer (LADO); or

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- when considered alongside previous concerns or other relevant information, indicates a pattern of behaviour requiring further safeguarding or management action.

Where the concern is assessed as low-level, the Headteacher will discuss it with the Catch22 Head of Safeguarding, normally through the scheduled weekly safeguarding meeting. This provides additional safeguarding oversight, supports consistency in decision-making and enables consideration of any emerging patterns or wider safeguarding implications.

Where there is uncertainty about whether the harm threshold may be met, or where immediate safeguarding action may be required, a triage call will be arranged as soon as possible between the Headteacher, Catch22 Head of Safeguarding, Executive Headteacher and a People Partner. The purpose of the triage call will be to consider the information available, determine any immediate safeguarding or employment actions required, and agree whether advice from or referral to the LADO is necessary. The matter will not wait for the scheduled weekly safeguarding meeting.

Where three low-level concerns have been recorded in relation to the same individual, the accumulated concerns will be formally reviewed with the Catch22 Head of Safeguarding and a People Partner. This review will consider the concerns collectively, identify whether there is an emerging pattern of behaviour, and determine whether any further safeguarding, management or employment action is required.
The threshold of three concerns does not prevent an earlier review or escalation. Where the nature, frequency, similarity or context of concerns indicates an emerging pattern or increased safeguarding risk, advice will be sought at an earlier stage where appropriate.

Where the information indicates that the harm threshold may clearly be met, advice from the LADO will be sought without delay and will not be delayed in order to convene the triage call.

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Where the behaviour is consistent with expected conduct

Where it is determined that the behaviour was consistent with the Staff Code of Conduct and does not constitute a safeguarding concern, the Headteacher will consider what feedback should appropriately be provided to the person who raised the concern and, where appropriate, the individual concerned.

The fact that a concern was found not to constitute inappropriate behaviour should not discourage staff from raising future concerns. Staff should be reassured that reporting a genuine concern in good faith is part of a healthy safeguarding culture.

Considering patterns of behaviour

In considering any concern, the Headteacher will review any previous low-level concerns or other relevant safeguarding information relating to the individual to identify whether there is an emerging pattern of behaviour.

A series of concerns which individually do not meet the harm threshold may, when considered collectively, indicate a pattern of concerning behaviour or a wider safeguarding risk. This may require further management action, consultation with the LADO or referral under the Managing Allegations Policy.

Responding to a low-level concern

Where a concern is confirmed as low-level, the response will be sensitive, fair and proportionate to the circumstances. Depending on the nature and context of the concern, this may include:

- no further action beyond recording the concern;
- a professional discussion or management guidance;
- clarification of professional boundaries or expectations;
- additional supervision, support or training;
- an agreed action plan or risk assessment;
- monitoring or review; or
- consideration under relevant People/HR procedures where the concern also raises issues of conduct or performance.

Where People/HR procedures may be required, appropriate advice will be sought from the People Partner.

Where a low-level concern relates to a supply member of staff, agency worker or contractor, the Headteacher will ensure that the individual's employer is notified as appropriate, so that any potential pattern of inappropriate behaviour can be identified.

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Any action taken, together with the determination made, the rationale for the decision and any relevant internal or external consultation, will be formally recorded on StaffSafe.

7. Storage and record retention of low-level concerns

All low-level concerns will be formally recorded on StaffSafe by the Headteacher. Records will be treated as confidential, stored securely and managed in accordance with the Data Protection Act 2018, UK GDPR and Catch22 information governance and retention requirements.

Records will include sufficient information to provide a clear account of the concern, the context in which it arose, the determination made, any action taken and the rationale for decisions.

Access to records of low-level concerns will be restricted to those who require the information for safeguarding, management or employment purposes.

The Headteacher will review records of low-level concerns regularly, including through discussion with the Catch22 Head of Safeguarding, to identify any potential patterns of concerning, problematic or inappropriate behaviour.

Where a pattern is identified, consideration will be given to whether:

- further safeguarding or management action is required;
- advice should be sought from the LADO;
- the matter should be considered under relevant People/HR procedures;
- there are wider issues relating to safeguarding culture, supervision, professional boundaries or practice; or
- policies, procedures, support or staff training should be reviewed or strengthened.

The outcome of such reviews and any actions arising from them will be appropriately recorded.

Low-level concern records will be retained in accordance with Catch22's records retention arrangements and applicable data protection requirements. When an individual leaves their employment or engagement with Catch22 Education, their StaffSafe record will be archived and retained in accordance with Catch22's retention arrangements, remaining accessible to authorised personnel where there is a legitimate safeguarding, employment or legal need.

8. References

When providing employment references, Catch22 Education will ensure that information provided is fair, accurate and consistent with current Keeping Children Safe in Education guidance and Catch22 employment and safeguarding procedures.

Low-level concerns which relate exclusively to safeguarding and which do not meet the harm threshold will not normally be included in an employment reference.

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Where a low-level concern also relates to matters which would ordinarily be relevant to an employment reference, such as substantiated misconduct or poor performance, relevant factual information may be included in accordance with Catch22 reference and People/HR procedures.

Where a pattern or group of low-level concerns about an individual, when considered collectively, has met the harm threshold and has been substantiated through the appropriate process, relevant safeguarding information will be considered for inclusion in accordance with current Keeping Children Safe in Education guidance.

Information about concerns or allegations which are unsubstantiated, unfounded, false or malicious will not be included in an employment reference.

Any safeguarding information included in a reference will be factual, accurate and appropriately evidenced.

9. Related policies

This policy should be read alongside the following Catch22 policies and procedures, as applicable:

- Catch22 Schools Safeguarding Policy
- Staff Code of Conduct
- Managing Allegations Policy
- Disciplinary Policy
- Whistleblowing Policy
- Grievance Policy
- Complaints and Compliments Policy

Where relevant, consideration should also be given to other Catch22 People, safeguarding and information governance policies and procedures.

This policy has been developed with regard to current statutory and regulatory guidance, including:

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- the Independent School Standards and associated Department for Education guidance.

Appendix 1 – Low-Level Concern Reporting Form

Use this form to record any concern, no matter how small, about the behaviour of an adult working in or on behalf of the school.

You do not need to decide whether this is a low-level concern or whether it meets the harm threshold. If you are concerned, report it promptly.

Person raising the concern

Name:

Role:

School/site:

Is this a self-report? ☐ Yes ☐ No

Person the concern relates to

Name:

Role:

Details of the concern

Date of incident/behaviour: _____ **Time:** _____

Location: _____

Please provide a **clear, factual and chronological account** of what you saw, heard or became aware of. Include the context and the names of any other people who may have relevant information.

Immediate action

Did you take any immediate action? ☐ Yes ☐ No

If yes, briefly describe what you did and why:

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Reporting the concern

Name of person receiving concern:
Role:
Date reported:
Time reported:

Signature of person raising concern: _____

Signature of person receiving concern: _____

Reporting route

Normally: **Staff member → Site DSL → Headteacher**

Concern about a DSL → Headteacher

Concern about the Headteacher → Executive Headteacher

The Headteacher is responsible for ensuring that low-level concerns are formally recorded on StaffSafe and managed in accordance with the Low-Level Concerns Policy.

Please pass this form on promptly. Do not retain personal copies containing confidential safeguarding information.

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Appendix 2 - Low-Level Concerns: Reporting and Action Flowchart

You see, hear or become aware of something that concerns you about an adult's behaviour.
You do not need to decide whether it is a low-level concern. If you are concerned, report it.

REPORT THE CONCERN PROMPTLY TO YOUR SITE DSL
Complete the Low-Level Concern Reporting Form
Site DSL reports the concern to the Headteacher

↓

Concern is about a DSL Report directly to the **Headteacher**	**Concern is about the Headteacher** Report directly to the **Executive Headteacher**

↓

HEADTEACHER REVIEWS THE CONCERN
Review information → gather further information where necessary → check previous concerns / patterns → determine the safeguarding response

↓

EXPECTED / APPROPRIATE CONDUCT	LOW-LEVEL CONCERN	POSSIBLE HARM THRESHOLD / IMMEDIATE SAFEGUARDING CONCERN
Behaviour is consistent with the Staff Code of Conduct. **Decision and rationale recorded** ↓ Feedback provided where appropriate ↓ No further safeguarding action unless other information emerges.	Behaviour falls below expected professional standards but does not currently meet the harm threshold. **Record on StaffSafe** ↓ Discuss with Catch22 Head of Safeguarding, normally at the weekly safeguarding meeting ↓ Agree proportionate action and review for patterns.	Concern may meet the harm threshold or immediate safeguarding action may be required. **Urgent triage as soon as possible** ↓ Headteacher + Catch22 Head of Safeguarding + Executive Headteacher + People Partner ↓ Consider immediate safeguarding / employment action and LADO advice or referral.

IMPORTANT
If the information indicates that the harm threshold may clearly be met, advice from the LADO will be sought **without delay**.
Contacting the LADO must not be delayed while waiting for the internal triage call.

Possible responses to a low-level concern
Record only → Professional discussion → Management guidance → Clarify professional boundaries
Support / training / supervision → Action plan or risk assessment → Monitoring / review → People/HR procedures where appropriate

LOW-LEVEL DOES NOT MEAN INSIGNIFICANT
A single concern may appear small. A pattern of concerns may indicate a more significant safeguarding issue.

NOTICE IT → REPORT IT → RECORD IT → REVIEW IT

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Annex 1: Equality Impact Assessment

This EIA is for:	Low Level Concerns Policy
EIA completed by:	Daryl Bates, Headteacher, Include Suffolk
Date of assessment:	29 September 2026
Assessment approved by:	

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

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2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of age. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their age.
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of any disability. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of any disability.
Gender reassignment **(transsexual,** **transgender, trans)** Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of their gender at any given time. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their gender.
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of marital status. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their marital status.

Pregnancy and maternity (in work this is linked to maternity leave, non- work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period	☐	☒	☐	It is not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.
following the birth of their child?				
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of their race, origin, colour or nationality. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of religion or beliefs. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	The policy applies equally to all members of staff and pupils regardless of their sex. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their sex.
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	The policy applies equally to all staff and pupils regardless of their sexual orientation. It is not considered that the policy includes any guidance or rules that may impact either positively or negatively on members of staff or pupils because of their sexual orientation.

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