

Low-Level Concerns Policy

Caterham Summer School



CATERHAM
SCHOOL

Policy Author:
Date Reviewed by Authors:
Next Review Date:

Summer School Manager
Spring Term 2026
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Caterham Summer School

Low-level Concerns Policy

Policy Status: Work Processes, Anti-Bullying, Behaviour, Safeguarding and Child Protection

Applies to: All staff, students, volunteers, contractors, visitors and partners

Author: Summer School and Holiday Programmes Manager

Last reviewed: April 2026

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1. Policy Statement and Aims

Caterham Summer School is committed to maintaining the highest standards of safeguarding and professional conduct. This policy sets out how **low-level concerns** about the behaviour of adults working in or on behalf of the Summer School will be identified, shared, recorded and reviewed. This policy is aligned with Section 12: Low-Level Concerns of the Caterham School Safeguarding Policy 2025–26 and reflects statutory guidance in [Keeping Children Safe in Education \(KCSIE\) – GOV.UK](#)

This policy also reflects guidance relating to professional conduct, safeguarding culture and information sharing in educational settings.

This policy applies to **all adults** working with children in the Summer School, including:

- staff (teaching and non-teaching)
- temporary and agency staff
- volunteers
- contractors and visitors

2. What Is a Low-Level Concern?

A **low-level concern** is any concern, however minor it may appear, that an adult working with children may have acted in a way that:

- is inconsistent with the Caterham Summer School Staff [Code of Conduct](#) or expected professional standards
- does not meet the harm threshold for managing allegations and therefore does not require referral to the Local Authority Designated Officer (LADO)

Definitions and safeguarding thresholds are applied in accordance with [Keeping Children Safe in Education \(KCSIE\) – GOV.UK](#) guidance

Low-level concerns may arise from:

- a sense of unease or “nagging doubt”
- a single incident or a pattern of behaviour
- information from a child, parent, colleague or third party
- concerns identified through supervision or monitoring processes.

Addressing low-level concerns transparently enables early intervention, promotes professional boundaries, and helps prevent escalation.

3. Principles Underpinning This Policy

Caterham Summer School recognises that low-level concerns:

- are not insignificant
- must be handled in a way that is fair, proportionate and confidential
- support a culture where safeguarding is everyone’s responsibility
- protect both children and adults by addressing concerns early.

In line with Section 12 of the Caterham School Safeguarding Policy, low-level concerns must always be:

- shared

- recorded
- reviewed appropriately

During the Caterham Summer School operation, the first point of contact for Low-level Concerns is the Summer School and Holiday Programmes Manager and Designated Safeguarding Lead.

Reporting procedures reflect statutory safeguarding expectations regarding concerns about adults working with children.

4. Reporting Low-Level Concerns

All low-level concerns **must** be reported promptly to the Summer School and Holiday Programmes Manager.

Concerns should be reported:

- as soon as possible after the concern arises
- directly, and not via informal discussion or gossip
- regardless of the seniority of the person involved

If the concern relates to the Summer School and Holiday Programmes Manager, it should be reported to the Commercial Manager or Caterham School DSL in line with the Caterham Summer School [Safeguarding policy](#).

5. Recording Low-Level Concerns

All low-level concerns will be:

- recorded in writing
- factual and objective, avoiding opinion
- dated and include details of:
 - the person raising the concern
 - the individual whose behaviour is of concern
 - what was observed or reported
 - any immediate actions taken

Records of low-level concerns will be held securely and confidentially, in accordance with data protection requirements, and in line with the approach set out in Section 12 of the Caterham School [Safeguarding Policy](#).

Personal data will be processed in accordance with [UK GDPR Guidance – ICO](#) and the [Data Protection Act 2018 – GOV.UK](#)

6. Review and Management of Concerns

The Summer School and Holiday Programmes Manager will:

- review the concern in a timely manner
- consider the context, frequency and any patterns of behaviour
- determine whether:
 - no further action is required
 - advice, guidance or training should be offered
 - increased supervision or support is required
 - the concern should be escalated under the Allegations Procedures Escalation process

Where necessary, low-level concerns may be considered collectively to identify emerging patterns, in line with best safeguarding practice.

7. Allegations Procedures Escalation

If, following review, a concern is considered to meet the harm threshold, it will be managed under the **Safeguarding Concerns and Allegations against Adults** which forms Section 11 of the Caterham School [Safeguarding Policy](#), including referral to the LADO where required, in accordance with the main safeguarding policy.

Escalation procedures are consistent with statutory safeguarding guidance and local authority safeguarding procedures.

8. Confidentiality and Information Sharing

Low-level concerns will be shared only with those who need to know to ensure pupil safety, fairness and appropriate management.

Caterham Summer School recognises that appropriate information sharing:

- supports a culture of transparency
- protects staff from potential misunderstandings
- strengthens safeguarding practice

Information sharing decisions will be made in accordance with [safeguarding responsibilities and data protection](#) legislation

9. Culture and Training

Caterham Summer School is committed to fostering an environment in which:

- staff feel confident to raise concerns without fear of reprisal
- safeguarding is embedded in everyday practice
- all adults understand what constitutes a low-level concern

All staff will receive safeguarding training that includes understanding and applying this policy.

Safeguarding training reflects requirements outlined in [Keeping Children Safe in Education \(KCSIE\) – GOV.UK](#)

10. Policy Review

This policy is reviewed annually and revised after or in response to significant change in legislation, guidance or incident.

It will also be reviewed whenever changes are made to KCSIE, Caterham School Safeguarding Policy, or Caterham Summer School operational arrangements.

This policy reflects statutory safeguarding guidance including [Keeping Children Safe in Education \(KCSIE\) – GOV.UK](#), [UK GDPR Guidance – ICO](#) and Caterham School best practice.

It is due for review in April 2027