



ST PAUL'S
GIRLS' SCHOOL

Reporting Low Level Concerns

Published September 2026

Document owner	Deputy Head (Safeguarding & Inclusion)/DSL
Approved by	Pending approval by the Education Committee Sept 26
Date published	September 2026
Review cycle	Annual
Next review date	September 2027
Availability	School website; staff portal

Legal framework

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025 (updated June 2026)
- Keeping children safe in education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- Teachers' Standards 2021

Availability of this policy

A copy of this policy may be downloaded from our [website](#) or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 0207 603 2288). This policy can be made available in large print or other accessible format if required.

Who this policy applies to

This policy applies to all members of the school's community, including students, parents, employees, temporary staff, contractors, agency workers, visiting music teachers and other peripatetic workers, volunteers, governors and all other people when working in or for the school. It applies whenever staff or volunteers are working with students, even where this is away from the school, e.g. on a school trip.

What this policy is for

This policy aims to:

- outline the importance of sharing, monitoring and recording low level concerns in order to provide a safe environment for students.
- set out the process for reporting low level concerns

Other relevant school policies

- Safeguarding (Child Protection) policy
- Staff Code of Conduct
- Whistleblowing policy
- Staff Data Protection policy
- Behaviour policy
- Supervision of Students policy
- Data Retention and Disposal policy
- Attendance (including Children Missing Education) policy

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Statement of intent

1.1 St Paul's Girls' School understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. It understands that, while a concern may be low-level, that concern can escalate over time to become much more serious.

1.2 The school prides itself on creating a safe and prosperous environment for students, and staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding students. The school has clear professional boundaries of which all staff are made aware and to which they will adhere. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to students and other children.

Definitions

2.1 For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour, or patterns of behaviour and repeated concerns (KCSIE) on the part of a staff member towards students that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the 'Appropriate and inappropriate behaviour' subsection of this policy.

2.2 The term 'low-level' concern does not mean that it is insignificant. Low level concerns should be recognised as part of a wider safeguarding culture (KCSIE). 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 with children may have acted in a way that:

- is inconsistent with an organisation's Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to merit a referral to the Local Area Designated Officer (LADO).

2.3 The London Safeguarding Children Procedures (LSCP) also make it clear that, with respect to any person who works with children, concerns or allegations can relate to their behaviour outside of work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to relate directly to a child but could, for example, include an arrest for the possession of a weapon
- have, as a parent or carer, become subject to child protection procedures; and/or
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

2.4 Staff are expected to declare any change in personal circumstances as above to the High Mistress, Deputy Head (Safeguarding & Inclusion)/Designated Safeguarding Lead (DSL) and/or HR. Low-level concerns are distinct from safeguarding concerns that meet the harm threshold (which may involve physical, emotional or psychological harm), and from matters that are solely disciplinary. Disciplinary action may be taken where a staff member has breached the Staff Code of Conduct or another policy, but where no safeguarding risk or harm is identified.

2.5 The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child.

Harms Threshold

Concern or allegation that may meet the harm threshold:

Behaviour which indicates that an adult who works with children 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.

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 with children may have acted in a way that:

- Is inconsistent with an organisation’s staff code of conduct, including in appropriate conduct outside of work; and
- Does not meet the harm threshold or is otherwise not serious enough to merit a referral to the LADO.

Appropriate Conduct

- Behaviour which is entirely consistent with the organisation’s staff code of conduct, and the law.

2.6 While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, or being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

Roles and responsibilities

3.1 The Governing Board is responsible for:

- Oversight of the reporting and evaluation of low-level concerns, with annual monitoring and trend analysis
- Ensuring that the school complies with its duties under child protection and safeguarding legislation
- Ensuring that policies, procedures and training opportunities with regard to reporting safeguarding concerns are compliant and effective
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations
- Ensuring that a suitably trained Designated Safeguarding Lead (DSL) has been appointed, alongside deputy DSLs where appropriate
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

3.2 The High Mistress is responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level

- Working with the Deputy Head (Safeguarding & Inclusion)/DSL to assess whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns as guided by the LADO, the Deputy Head (Safeguarding & Inclusion)/DSL, and HR
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to them at all times
- Safeguarding students' wellbeing and maintaining public trust in the teaching profession and in the school's reputation
- Ensuring that all staff have undertaken safeguarding training
- Ensuring that all staff have an ongoing awareness of what low-level concerns are and the reporting procedures.

3.3 The Deputy Head (Safeguarding & Inclusion)/DSL (and in their absence the nominated DDSL), is responsible for:

- Ensuring low level concerns are reviewed regularly for patterns and escalating to the LADO where necessary
- Scrutinising low-level concern trends for indicators of systemic bias, racism, or discriminatory behaviour within the staff cohort
- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level
- With the High Mistress, assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns
- Following all procedures outlined in this policy for acting upon low-level concerns
- Liaising with the High Mistress, staff members, HR, the governing board and all relevant agencies to act upon concerns, where necessary
- Keeping detailed, accurate and secure written records of all low-level concerns, discussions and decisions made including the rationale for those decisions, and any actions taken.

3.4 Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times
- Reading the prevailing KCSIE and being familiar with its content
- Interacting with students in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between students and staff members
- Understanding the importance of reporting low-level concerns
- Reporting all safeguarding concerns that they may have about students immediately
- Reporting all safeguarding concerns that they may have about the behaviour of a member of staff immediately (including self-referral, when necessary) however small or seemingly minor these may be and even if they feel unsure about whether to report the concern

Prevention among staff

Appropriate and inappropriate behaviour

4.1 The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards students.

4.2 Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to students
- There is a significant power imbalance in the student-staff dynamic
- There are more stringent expectations on their behaviour with regard to students due to their position as a professional adult with a duty of care.

4.3 Staff will remain aware of the fact that all students irrespective of age, regardless of the phase and year group they are at within the school, fall under the school's duty of care – as a result, staff will ensure that they do not assume maturity on behalf of a student and do not engage with students as they would with their own peers. Staff will be aware that, where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Deputy Head (Safeguarding & Inclusion)/DSL or one of the DDSLs immediately.

Recognising a low-level concern

4.4 Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Deputy Head (Safeguarding & Inclusion)/DSL include:

- Giving personal contact details to a student
- Using personal car to transport a student/students (without prior permission or in exceptional circumstances)
- Offering/accepting excessive personal gifts from a student or their family
- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with students, e.g. conversations that are about a staff member's personal life or are of a sexual nature
- Having favourites – this could include, but is not limited to, calling students by pet names or terms of endearment or buying students gifts
- Taking photographs of children on a personal mobile phone or device
- Creation of self-generated images and/or videos including those generated using AI e.g. deepfakes
- Engaging with a child on a one-to-one basis in a secluded area or in a room with no windows and the door closed.

4.5 Staff will be aware that some of the above low-level concerns may meet the harms threshold, depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g., a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks. For further guidance, please see the Supervision of Students policy.

4.6 Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who inadvertently engage in low-level inappropriate behaviour in relation to students will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The High Mistress, and Deputy Head (Safeguarding & Inclusion)/DSL will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School culture

4.7 The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

4.8 The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards students. All staff have read, understand and adhere to the 'appropriate and inappropriate behaviour' subsection of this policy, as well as the Staff Code of Conduct and the Safeguarding (Child Protection) policy.

4.9 Staff will address any questions they have regarding safeguarding to the Deputy Head (Safeguarding & Inclusion) Director of Safeguarding & Inclusion (DSL). The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g., students are not treated as friends and an appropriate professional distance is maintained by staff.

4.10 The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary.

The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards students that may indicate a safeguarding concern, and how to identify signs of abuse, harm, neglect or exploitation in students.

Evaluating school culture following concerns

4.11 The school will ensure that appropriate consideration is given to the school's culture, and whether or not it has enabled the inappropriate behaviour to occur. The High Mistress will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

Reporting concerns

5.1 The school will promote a culture in which safeguarding students is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

5.2 Staff will report all safeguarding concerns they have to the Deputy Head (Safeguarding & Inclusion)/DSL or one of the DDSLs immediately in line with the procedures laid out in the Safeguarding (Child Protection) policy. Concerns should be reported immediately and no later than the end of the working day (KCSIE). If in exceptional circumstances, the Deputy Head (Safeguarding & Inclusion)/DSL or DDSLs are not available, this should not delay appropriate action being taken. Staff should consider speaking to the Senior Deputy Head or the High Mistress. Where the report concerns a specific incident, staff members will report their concerns no later than **24** hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

5.3 Staff members must report any concerns about colleagues directly to the Deputy Head (Safeguarding & Inclusion)/DSL and by submitting a report through the StaffSafe option in CPOMS. All staff receive training on how to use the reporting system and are expected to manage their accounts responsibly. Concerns should be submitted via this platform and not by email, to ensure consistency, security and accurate record-keeping.

5.4 The Deputy Head (Safeguarding & Inclusion) consults with the High Mistress on all concerns received about members of staff.

5.5 When submitting concerns, staff will take care to ensure that they observe the Safeguarding (Child Protection) policy and protect the identity of all individuals to which the concern pertains as far as possible. Where a low-level concern is raised about the:

- Deputy Head (Safeguarding & Inclusion), it should be reported to the High Mistress.
- High Mistress, it should be reported to the Chair of Governors.
- Chair of Governors, it should be reported to the LADO LADO@lbhf.gov.uk.

5.6 Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

5.7 Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff should be report it to the Deputy Head (Safeguarding & Inclusion)/the DSL who will, in turn, inform the employment agency of the subject of the concern.

5.8 All concerns reported will be documented in line with the Safeguarding (Child Protection) policy.

Self-reporting

6.1 On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted
- Could appear compromising to others
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct and the Safeguarding (Child Protection) policy

6.2 The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The High Mistress and the Deputy Head (Safeguarding & Inclusion)/DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report. KCSIE encourages self-reporting to support transparency and safer culture.

6.3 Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Evaluating concerns

7.1 On receipt of a low-level concern via StaffSafe, the concern will be triaged by the Deputy Head (Safeguarding & Inclusion), the Head of HR, or the High Mistress, and responsibility for managing the concern allocated according to its nature. In general, the Head of HR will oversee matters relating to professional conduct and colleague-to-colleague concerns where there is no indication of risk to a child. Concerns relating to safeguarding practice, professional boundaries with students, or any matter relevant to child welfare will ordinarily be managed by the Deputy Head (Safeguarding & Inclusion).

7.2 As part of the initial assessment, the senior colleague leading the case may make such enquiries as are necessary to establish the nature and context of the concern, including speaking with the person who raised it. Concerns will be handled sensitively and, wherever possible, confidentially. However, confidentiality cannot be guaranteed where information sharing is necessary to ensure a fair and appropriate investigation, safeguard children, or meet legal or regulatory obligations.

7.3 The member of staff who is the subject of the concern will normally be informed of the concern and given an opportunity to respond, where it is appropriate to do so. In exceptional circumstances, including where

there is an immediate safeguarding risk, a need to preserve evidence, or advice from the Local Authority Designated Officer (LADO), notification may be delayed or managed differently.

7.4 Where the High Mistress is notified of a safeguarding concern involving a member of staff, she will use her professional judgement, in consultation with the Deputy Head (Safeguarding & Inclusion)/DSL, to determine whether the matter constitutes a low-level concern or requires immediate escalation under the School's Safeguarding (Child Protection) Policy. Consideration will be given to the nature of the concern, any pattern of previous concerns, and whether the matter indicates wider cultural, behavioural or training issues. Advice will be sought from external agencies where appropriate and in accordance with the School's Data Protection and Safeguarding (Child Protection) policies.

7.5 In evaluating a low-level concern, the High Mistress and Deputy Head (Safeguarding & Inclusion)/DSL may:

- review relevant information and any previous low-level concerns relating to the individual;
- consider whether the reported behaviour is consistent with the Staff Code of Conduct, statutory guidance and the law;
- determine whether the concern, either alone or when considered alongside previous concerns, meets the threshold for reclassification as an allegation to be managed under the Safeguarding (Child Protection) Policy;
- seek advice from external agencies where appropriate;
- ensure that accurate and detailed records are maintained of the concern, the evaluation process, and any decisions or actions taken.

Acting on concerns

Where the concern is unfounded

8.1 If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct, the Safeguarding (Child Protection) policy and the law, the High Mistress or Deputy Head (Safeguarding & Inclusion)/DSL will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The High Mistress or Deputy Head (Safeguarding & Inclusion)/DSL will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The High Mistress or Deputy Head (Safeguarding & Inclusion)/DSL will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

8.2 The High Mistress will discuss the concern with the Deputy Head (Safeguarding & Inclusion)/DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the Deputy Head (Safeguarding & Inclusion)/DSL and High Mistress will work together to resolve this with input from other staff members, as necessary.

Where the concern is low-level

8.3 Where the High Mistress in discussion with the Deputy Head (Safeguarding & Inclusion)/DSL determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The Deputy Head (Safeguarding & Inclusion)/DSL holds a meeting with the individual about whom the concern was reported, during which they will:
 - talk to the individual in a non-accusatory and sympathetic manner

- inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible)
- clearly state how their behaviour was inappropriate and problematic
- discuss the reasons for the behaviour with the individual
- inform the individual clearly why their behaviour needs to change
- discuss any support that the individual may require to achieve the proper standards of behaviour
- allow the individual the opportunity to respond to the concern in their own words.

8.4 The Deputy Head (Safeguarding & Inclusion)/DSL asks the individual to re-read the Staff Code of Conduct depending on the nature of the concern.

8.5 The Deputy Head (Safeguarding & Inclusion)/DSL and the High Mistress will consider whether the individual should receive guidance, supervision or any further training.

8.6 Where considered appropriate in the circumstances, the Deputy Head (Safeguarding & Inclusion)/DSL will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.

8.7 Where it is necessary to undertake an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.

8.8 Where any student or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

8.9 The Deputy Head (Safeguarding & Inclusion)/DSL will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Safeguarding (Child Protection) policy and the Data Protection policy. The High Mistress will ensure that these records are kept organised and up to date, in keeping with the Data Retention and Disposal policy and that it is easy to refer back to them if any other concerns are reported about the same individual.

8.10 The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated to the LADO and dealt with in line with the Safeguarding (Child Protection) policy, Allegations Against Staff section.

Where the concern is serious

8.11 The High Mistress may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated and dealt with as an allegation. The High Mistress will then follow the procedures laid out in the Safeguarding (Child Protection) policy, Allegations Against Staff section.

Record keeping

9.1 The school will retain all records of low-level concerns. In exceptional circumstances (e.g. where a concern has been found to be malicious or vexatious), the school may take the decision not to retain the concern. The Deputy Head (Safeguarding & Inclusion)/DSL is responsible for ensuring that these records are accurate, up to date, and stored within the electronic low-level concerns file. All records are kept together in an organised, and consistent manner, so that they can be easily reviewed and analysed when required. The school uses

CPOMS Staff Safe as its central, secure platform for recording concerns. Access to this system is strictly limited to the Deputy Head (Safeguarding & Inclusion)/DSL, the High Mistress and the Head of HR.

9.2 Records will include:

- A detailed and accurate summary of the concern
- Details of discussions and decisions made including the rationale for those decisions
- A note of any action taken, decisions reached, and the outcome
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

9.3 The Deputy Head (Safeguarding & Inclusion)/DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The Deputy Head (Safeguarding & Inclusion)/DSL will keep records of these reviews.

9.4 Where any concerning patterns of behaviour have been identified with regard to a member of staff, the Deputy Head (Safeguarding & Inclusion)/DSL will consult with the High Mistress to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. The LADO may also be contacted for advice at any stage of the process.

9.5 Records of low-level concerns will not normally be held on the HR file of the individual concerned, unless there have been multiple concerns about the same person. Where a concern is judged to be serious and processed as an allegation, records will be retained in the staff member's personnel file. Where multiple low-level concerns are recorded, these will be stored together in chronological order.

9.6 Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

9.7 The Deputy Head (Safeguarding & Inclusion)/DSL will ensure that all records are kept in a manner that is consistent with the Staff Data Protection policy and the Data Retention and Disposal policy. Records will be confidential, kept password-protected, and managed correctly, in keeping with both policies.

9.8 The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e., it has met the harm threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g., misconduct or poor performance. In line with DfE guidance, such concerns will not ordinarily be included in references unless they demonstrate a sustained pattern of behaviour that has met the harm threshold. The school will seek up-to-date legal advice on references where necessary and will inform the member of staff accordingly.

Monitoring and review

10.1 This policy will be reviewed annually by the High Mistress and Deputy Head (Safeguarding & Inclusion)/DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. The policy is approved by the governors' Education Committee.