



# Orange Tree School

## Low-Level Concerns and Professional Boundaries Policy

OTS Oakleigh Pk and Ridgeway Sites

Independent School Standards: Paragraphs 7 and 34



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# Quick Reference Guide to this Policy

## *Introduction*

This Quick Reference Guide provides a summary of the key principles and expectations contained within Orange Tree School's Low-Level Concerns and Professional Boundaries Policy. It is designed to support everyday practice by highlighting the professional standards that help keep children safe, maintain appropriate boundaries and promote a culture of openness, accountability and reflective practice.

This guide is not a substitute for reading the full policy. All staff are expected to be familiar with the complete policy and to follow its guidance. Where there is any uncertainty, staff should seek advice from the Designated Safeguarding Lead (DSL), the Headteacher or a member of the Senior Leadership Team.

## *Low-Level Concerns and Professional Boundaries Quick Reference Guide*

### *Our Safeguarding Culture*

At Orange Tree School, safeguarding is everyone's responsibility. We encourage staff to speak up early, seek advice when unsure and maintain professional boundaries that protect both pupils and adults.

### *Remember*

- ✓ Build warm, positive and trusting relationships.
- ✓ Always act in the child's best interests.
- ✓ Maintain clear professional boundaries.
- ✓ Be open, transparent and professionally accountable.
- ✓ If in doubt, seek advice.

### *Professional Boundaries*

Professional relationships should:

- promote safety, trust and wellbeing;
- encourage resilience and independence;
- remain transparent and professional;
- never create dependency or favouritism.

### *Ask yourself:*

Would I be comfortable explaining this to a parent, the DSL, the Headteacher or an inspector?

### *Physical Contact*

Appropriate physical contact may sometimes be necessary in a specialist SEND environment.

Always ensure it is:

- child-centred;
- proportionate;
- appropriate to the child's needs;
- consistent with agreed plans;
- professionally justifiable;
- reported to the appropriate leader or DSL where the contact is outside routine practice, unusually prolonged, repeated, or could reasonably be misunderstood; and recorded in sufficient factual detail to explain the context, reason for the contact and action taken, where appropriate.

The child's need for comfort should always be met. Your responsibility is to decide how that comfort can be provided safely and professionally.

### *Gifts and Rewards*

Kindness is one of Orange Tree School's core values.

However:

- don't buy gifts or treats with your own money;
- don't bring personal items from home without approval;
- use agreed school reward systems;
- avoid creating favouritism or dependency;
- if in doubt, consult your line manager, the DSL or a member of the Senior Leadership Team before proceeding.

### *Attachment and Dependency*

Positive attachments are expected.

Watch for signs that a pupil or a parent or carer is becoming overly reliant on one member of staff.

If this happens:

- discuss it early;
- involve the wider team;
- maintain professional boundaries;
- remember that leadership may adjust staffing arrangements where this is in the best interests of the child and to protect staff;
- record any agreed changes, concerns or management decisions in sufficient factual detail to explain the circumstances and actions taken.

### *Low-Level Concerns*

Report concerns if someone's behaviour:

- falls below professional expectations;
- blurs professional boundaries;
- causes you to feel uneasy;
- could become a safeguarding concern.

No concern is too small to share.

### *Reporting*

Report concerns promptly to:

- the Headteacher; or
- the Chair of the Advisory Board if the concern relates to the Headteacher.

If you are unsure whether something is a low-level concern:

Ask. Don't assume.

### *Orange Tree Principles*

At Orange Tree School we believe:

- safeguarding is everyone's responsibility;
- professional curiosity keeps children safe;
- kindness and professionalism go together;
- early conversations prevent bigger concerns;
- speaking up protects children, colleagues and yourself.

### *One Final Question*

Before you act, ask yourself:

Is this in the child's best interests, consistent with our values and professional boundaries, and would I be comfortable explaining my decision openly?

If the answer is no or I'm not sure, seek advice before proceeding.

## 1. Introduction

Orange Tree School is committed to maintaining the highest standards of professional conduct, safeguarding practice and child-centred care.

We recognise that safeguarding is strengthened where staff feel confident to raise concerns about professional conduct at the earliest opportunity, before behaviour develops into a more serious safeguarding concern.

This policy is intended to support staff in making safe, professional decisions in their everyday practice. It should be read not only when concerns arise, but as guidance for maintaining positive, therapeutic and professionally appropriate relationships with pupils.

The purpose of this policy is to promote a culture of openness, transparency, accountability and reflective practice in which concerns can be raised, discussed and managed proportionately. It aims to protect children, support staff and maintain public confidence in the school's safeguarding arrangements.

Orange Tree School recognises that staff working within a specialist SEND environment often develop positive, trusting relationships with pupils. These relationships are essential to effective education and care; however, they must always remain professional. Clear professional boundaries protect both children and adults and reduce the risk of misunderstanding, dependency, favouritism or harm.

The school believes that reporting low-level concerns is a positive safeguarding practice and should never be viewed as disloyalty or criticism of colleagues. Instead, it demonstrates a shared commitment to safeguarding children and maintaining the highest professional standards.

Where concerns are raised promptly, many can be resolved through discussion, support, guidance or reflective practice. Early reporting also enables the school to identify patterns of behaviour which may not be apparent when individual incidents are viewed in isolation.

Nothing in this policy replaces the procedures for managing allegations that a person working with children has behaved in a way that may have harmed a child, committed a criminal offence against a child, or behaved in a way that indicates they may pose a risk of harm to children. Such concerns will be managed in accordance with the Child Protection and Safeguarding Policy and relevant statutory guidance.

## 2. How to Use This Policy

This policy is intended to support professional judgement and should be used as part of everyday practice rather than only when concerns arise.

Staff are encouraged to use this policy to:

- reflect on professional boundaries;
- support professional discussions and supervision;
- seek advice when uncertain;
- promote consistent safeguarding practice;
- reinforce Orange Tree School's values and expectations.

This policy should be read alongside the Staff Code of Conduct, Child Protection and Safeguarding Policy and Speaking Up (Whistleblowing) Policy.

Where uncertainty exists, staff should seek advice from the Designated Safeguarding Lead (DSL) or a member of the Senior Leadership Team.

## 3. Statement of Intent

Orange Tree School is committed to fostering a culture of openness, honesty, accountability and professional respect in which the welfare of children is paramount.

The school recognises that maintaining clear professional boundaries is essential to safeguarding children, protecting staff and promoting confidence in the school's safeguarding arrangements. Positive, caring and supportive relationships between staff and pupils are fundamental to effective education and care, particularly within a specialist SEND environment. However, these relationships must always remain professional, appropriate and focused on the best interests of the child.

The purpose of this policy is to ensure that concerns about professional conduct are identified, reported, discussed and managed at the earliest possible stage. Early reporting enables the school to provide support, guidance and reflective supervision where

appropriate, whilst also identifying patterns of behaviour that may indicate an emerging safeguarding risk.

Orange Tree School encourages all staff to report low-level concerns, whether those concerns relate to their own conduct or the conduct of another adult working within the school. Reporting concerns is viewed as a positive safeguarding practice and an important contribution to maintaining a safe environment for children. Staff should never feel that raising a genuine concern is disloyal or that it will automatically result in disciplinary action.

The school is committed to responding to low-level concerns fairly, proportionately and consistently. Where appropriate, concerns will be addressed through supportive conversations, guidance, coaching or additional supervision. Where concerns indicate a potential breach of safeguarding procedures, professional standards or statutory guidance, they will be managed in accordance with the School's Child Protection and Safeguarding Policy and relevant employment procedures.

Orange Tree School recognises that safeguarding is strengthened through professional curiosity, reflective practice and a willingness to learn from mistakes. Staff are encouraged to seek advice whenever they are uncertain about professional boundaries or safeguarding expectations rather than making assumptions or acting alone.

The school will ensure that all low-level concerns are recorded appropriately, considered in context and reviewed to identify emerging themes or patterns of behaviour. While an individual incident may not, in isolation, meet the threshold for formal action, a series of low-level concerns may indicate a more significant safeguarding issue requiring further investigation or intervention.

Through this policy, Orange Tree School seeks to promote a culture in which children are protected, staff are supported and professional standards are maintained consistently across all aspects of school life.

## 4. Scope

This policy applies to all adults working on behalf of Orange Tree School, regardless of their role or employment status.

This includes:

- employees;
- the Headteacher;
- members of the Advisory Board;
- agency and supply staff;
- volunteers;
- contractors working regularly on site;
- apprentices;
- trainees and students on placement;

- peripatetic staff;
- consultants;
- visitors undertaking regulated activity; and
- any other adult engaged to work with or on behalf of the school.

All adults working within the school have a responsibility to maintain appropriate professional boundaries, act in accordance with the school's values and Code of Conduct, and contribute to a culture in which safeguarding concerns are identified and addressed promptly.

This policy applies to conduct within the school environment, during educational visits, off-site activities, online interactions undertaken as part of school business, and any behaviour outside work which may affect an individual's suitability to work with children or the reputation of the school.

Nothing within this policy prevents concerns from being managed under other School procedures where appropriate. Depending on the nature and seriousness of the behaviour, concerns may be addressed through supervision, professional support, safeguarding procedures, capability or disciplinary processes, or statutory safeguarding procedures where the threshold for an allegation has been met.

## 5. Legal Framework

This policy has been developed in accordance with the following legislation and statutory guidance:

- Keeping Children Safe in Education (DfE, 2026)
- Working Together to Safeguard Children
- The Education (Independent School Standards) Regulations 2014 (as amended)
- The Children Act 1989
- The Children Act 2004
- The Education Act 2002
- The Equality Act 2010
- The Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Teachers' Standards (DfE)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People (Safer Recruitment Consortium)
- Disqualification under the Childcare Act 2006 (where applicable)

## 6. Definitions

For the purposes of this policy, the following definitions apply:

*Allegation*

An allegation is a concern that an adult 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.

Allegations that meet this threshold will be managed in accordance with the School's Child Protection and Safeguarding Policy, statutory guidance and relevant safeguarding procedures. They are not managed under this policy.

#### *Low-Level Concern*

A 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 School's Staff Code of Conduct or expected professional standards;
- falls below the expected standards of behaviour;
- may indicate poor judgement, a lapse in professional boundaries or a failure to follow agreed procedures; or
- has the potential to develop into a more significant safeguarding concern if not addressed.

A low-level concern does not meet the threshold of an allegation but should nevertheless be reported and considered appropriately.

#### *Professional Boundaries*

Professional boundaries are the clear expectations and standards that govern relationships between adults and pupils.

Maintaining appropriate professional boundaries helps ensure that relationships remain safe, respectful, consistent and focused on the best interests of the child. Professional boundaries protect pupils from harm and protect staff from misunderstandings, allegations or situations that could compromise their professional judgement or integrity.

#### *Professional Curiosity*

Professional curiosity is the willingness to question, explore and reflect upon information rather than making assumptions or accepting situations at face value.

It involves considering the wider context, recognising patterns of behaviour and seeking further information where something does not feel right, even where there is no immediate evidence of harm.

### *Reflective Practice*

Reflective practice is the process of thinking critically about professional decisions, actions and interactions in order to promote learning, improve practice and strengthen safeguarding.

Orange Tree School encourages staff to seek advice, reflect on their practice and learn from experience as part of maintaining high professional standards.

### *Self-Reporting*

Self-reporting is when a member of staff voluntarily reports their own conduct or actions because they believe they may have exercised poor judgement, made a mistake or acted in a way that could be perceived as inconsistent with professional expectations.

Orange Tree School recognises self-reporting as a positive safeguarding practice and encourages staff to raise concerns promptly so that appropriate support, guidance or action can be provided.

### *Cumulative Concerns*

A cumulative concern arises where a number of individual low-level concerns, when viewed together, indicate a pattern of behaviour that may increase safeguarding risks or suggest that further action is required.

While a single incident may not be significant in isolation, repeated concerns may indicate an emerging safeguarding issue.

### *Favouritism*

Perceptions of favouritism may also arise in professional relationships between colleagues. Leaders and managers should ensure that decisions, opportunities and professional support are allocated fairly, transparently and on the basis of objective professional judgement. Actual or perceived favouritism between colleagues can undermine trust, discourage staff from speaking openly and weaken the school's safeguarding culture.

In relationships with pupils, perceptions of favouritism may also create dependency, damage trust and increase safeguarding risks.

### *Conflict of Interest*

A conflict of interest exists where an adult's personal interests, relationships or circumstances could influence, or reasonably be perceived to influence, their professional judgement, decision-making or conduct.

All actual, potential or perceived conflicts of interest should be declared to the Headteacher or an appropriate member of the Senior Leadership Team.

### *Acts of Kindness*

Acts of kindness are positive actions intended to support, encourage or celebrate pupils. These may include praise, rewards, recognition, practical support or other thoughtful gestures that contribute to pupils' wellbeing and development.

Orange Tree School values kindness as a core principle of its ethos. However, acts of kindness must always be exercised within clear professional boundaries and in accordance with School policies and procedures. They should be transparent, equitable, appropriately authorised where necessary, and should never create dependency, perceptions of favouritism or compromise professional relationships.

## 7. Guiding Principles

Orange Tree School believes that safeguarding is everyone's responsibility. Maintaining high standards of professional conduct is fundamental to creating a safe, respectful and nurturing environment in which children and young people can thrive.

The following principles underpin this policy and should guide the professional judgement and conduct of all adults working within or on behalf of the school.

### *Child-Centred Practice*

The welfare of the child is paramount. All decisions and actions must be taken in the best interests of the child and should promote their safety, wellbeing and development.

### *Professional Relationships*

Positive, trusting and respectful relationships between staff and pupils are central to effective teaching, learning and pastoral care. These relationships should always remain professional, maintaining appropriate boundaries that protect both pupils and staff.

### *Professional Relationships Between Colleagues*

Professional relationships between colleagues should be respectful, appropriate and consistent with the school's values. Staff are expected to communicate professionally, maintain appropriate workplace boundaries and treat colleagues fairly and with dignity.

Staff should avoid conduct that may create actual or perceived favouritism, conflicts of interest, exclusion, dependency or blurred professional boundaries. Concerns about the conduct of colleagues should be raised respectfully through the appropriate procedure and should not be discussed through gossip, speculation or informal channels.

Positive professional relationships between colleagues support effective safeguarding, constructive challenge, staff wellbeing and a culture in which people feel able to speak openly when something does not feel right.

### *Orange Tree School Values*

The school's values are at the heart of everyday practice. Staff are expected to demonstrate kindness, respect, integrity, professionalism and accountability in all interactions with pupils, families and colleagues.

Kindness is encouraged and valued; however, kindness must always be exercised within clear professional boundaries. Acts of care, support or generosity should be transparent, equitable and consistent with the school's policies and procedures.

#### *Openness and Transparency*

The school promotes a culture in which staff feel confident to raise concerns, seek advice and acknowledge mistakes without fear of unnecessary blame. Early reporting enables concerns to be addressed promptly, supports reflective practice and strengthens safeguarding arrangements.

#### *Professional Curiosity*

Staff should remain professionally curious, recognising that seemingly minor incidents or changes in behaviour may indicate a wider safeguarding concern. Concerns should never be dismissed without appropriate consideration of the context and any emerging patterns.

#### *Reflective Practice*

Orange Tree School values reflective practice as an essential part of professional development and safeguarding. Staff are encouraged to reflect on their decisions, seek feedback and continually develop their practice in order to maintain high standards of professional conduct.

#### *Fairness and Consistency*

Professional standards should be applied consistently to all pupils. Staff should avoid behaviour that could create actual or perceived favouritism, dependency or unequal treatment.

#### *Accountability*

All adults are accountable for their own conduct and share responsibility for maintaining a safe culture within the school. Staff should be prepared to explain and justify their professional decisions and actions where appropriate.

#### *Learning Rather Than Blame*

Where appropriate, low-level concerns will be used as opportunities for learning, coaching and professional development. However, repeated concerns, breaches of professional boundaries or behaviours that present a safeguarding risk will be managed appropriately and may result in formal procedures.

Professional judgement should never be exercised in isolation. Where staff are uncertain about the appropriateness of a decision, action or professional boundary, they should seek

advice from the Designated Safeguarding Lead, a member of the Senior Leadership Team or another appropriate senior colleague before proceeding wherever possible.

## 8. Roles and Responsibilities

Safeguarding is everyone's responsibility. All adults working in or on behalf of Orange Tree School have a duty to maintain the highest standards of professional conduct, act within clear professional boundaries and contribute to a culture in which concerns are identified, shared and managed appropriately.

### *The Advisory Board*

The Advisory Board is responsible for:

- ensuring that the school has effective policies and procedures for managing low-level concerns;
- promoting a culture of openness, transparency and accountability;
- ensuring safeguarding arrangements comply with statutory requirements and the Independent School Standards;
- receiving appropriate assurance that safeguarding systems, including the management of low-level concerns, are effective;
- supporting the Headteacher in maintaining a strong safeguarding culture throughout the school.

### *The Headteacher*

The Headteacher has overall responsibility for ensuring this policy is implemented effectively and consistently.

The Headteacher will:

- promote a culture in which staff feel confident to raise concerns and seek advice;
- ensure low-level concerns are managed fairly, proportionately and consistently;
- determine whether concerns remain low-level or require escalation to formal safeguarding or disciplinary procedures;
- seek advice from the Local Authority Designated Officer (LADO), regulatory bodies or other agencies where appropriate;
- ensure appropriate records are maintained;
- monitor themes and patterns to identify emerging safeguarding risks;
- ensure staff receive appropriate training, guidance and supervision regarding professional boundaries.

### *The Designated Safeguarding Lead (DSL)*

The DSL and Deputy Designated Safeguarding Leads (DDSLs) play a central role in advising on safeguarding matters arising from low-level concerns.

The DSL and DDSs will:

- provide advice to staff and leaders regarding safeguarding thresholds;
- support the assessment of concerns where safeguarding issues may be emerging;
- identify patterns or repeated concerns that may indicate increased risk;
- contribute to safeguarding decision-making and professional discussions;
- work collaboratively with the Headteacher where concerns require escalation;
- support staff in maintaining safe professional boundaries;
- promote reflective safeguarding practice across the school.

#### *Senior Leadership Team*

Members of the Senior Leadership Team will:

- model the highest standards of professional conduct;
- reinforce Orange Tree School's values through their leadership;
- provide advice and guidance to staff who are uncertain about professional boundaries;
- respond promptly and appropriately to concerns raised;
- encourage reflective practice and professional learning;
- support staff whilst ensuring safeguarding remains the overriding priority.

#### *All Staff*

All adults working in or on behalf of the school are responsible for safeguarding children and maintaining appropriate professional standards.

This includes teachers, Learning Support Assistants (LSAs), therapists, ELSAs, mentors, pastoral staff and all other adults who provide educational, therapeutic or pastoral support. The school recognises that these roles may involve supporting pupils during periods of heightened anxiety, distress or emotional dysregulation and may require a high level of trust, emotional support, empathy and, on occasions, appropriate physical reassurance.

Whilst these relationships are essential to supporting pupils effectively, they must always remain professional, transparent and consistent with the school's safeguarding procedures, agreed support plans and professional boundaries.

#### *Staff are expected to:*

- act in accordance with the school's values, policies and Staff Code of Conduct;
- maintain clear professional boundaries at all times;
- exercise professional judgement and seek advice where they are uncertain;
- report low-level concerns about themselves or others without delay;
- participate honestly in discussions relating to concerns;
- engage positively with reflective practice, supervision and professional development;
- treat colleagues with professionalism and respect throughout any process;
- recognise that safeguarding is a shared responsibility and that raising concerns is a professional duty.

Staff should remember that it is always better to seek advice than to make assumptions. Where there is uncertainty about whether behaviour is appropriate or whether a concern should be reported, staff should consult the Headteacher, DSL or another member of the Senior Leadership Team at the earliest opportunity.

#### *Agency Staff, Volunteers and Visitors*

Adults who are not directly employed by the school, including agency staff, volunteers, contractors, students and visitors undertaking regulated activity, are expected to comply with this policy whilst working at Orange Tree School.

They must:

- understand and follow the school's safeguarding procedures;
- maintain appropriate professional boundaries;
- report concerns promptly to the Designated Safeguarding Lead or another senior member of staff;
- cooperate fully with any enquiries relating to safeguarding or professional conduct.

## 9. Professional Boundaries

Professional boundaries are essential to safeguarding children, protecting pupils, supporting staff and maintaining the trust and confidence of parents, carers, colleagues and the wider school community.

Orange Tree School recognises that positive, nurturing and respectful relationships are fundamental to effective education and care, particularly within a specialist SEND environment. Staff are encouraged to build warm, supportive and trusting relationships with pupils; however, these relationships must always remain professional, appropriate and focused on the best interests of the child.

Professional boundaries help ensure that staff exercise sound judgement, maintain objectivity and avoid situations that could place themselves or pupils at risk of harm, misunderstanding or allegations.

All adults working in or on behalf of the school are expected to maintain appropriate professional boundaries at all times.

Staff should:

- treat all pupils with dignity, respect and compassion;
- maintain relationships that are professional, consistent and child-centred;
- exercise sound professional judgement in all interactions;
- model the behaviour and values expected within the School community;
- seek advice whenever they are uncertain about the appropriateness of a decision or action;

- be open and transparent in their professional practice;
- ensure that their conduct could withstand professional scrutiny.

Staff must not:

- develop relationships with pupils that could reasonably be perceived as personal rather than professional;
- show actual or perceived favouritism towards individual pupils;
- create situations in which a pupil becomes overly dependent upon one member of staff;
- communicate with pupils through personal social media accounts or unauthorised communication platforms;
- share unnecessary personal information or involve pupils in their own personal circumstances;
- accept or encourage inappropriate familiarity from pupils;
- place themselves in situations that could compromise professional judgement or safeguarding.

### *Professional Judgement*

Staff are expected to exercise professional judgement in all aspects of their work.

Professional judgement should be informed by:

- the child's best interests;
- the school's values and policies;
- safeguarding responsibilities;
- the individual needs of the pupil;
- transparency and accountability; and
- advice from colleagues where appropriate.

Where staff are uncertain whether an action is appropriate, they should seek advice from the Designated Safeguarding Lead (DSL), the Headteacher or another member of the Senior Leadership Team before proceeding wherever practicable.

### *Maintaining Professional Relationships*

Positive relationships should promote pupils' confidence, wellbeing, independence and resilience.

Staff should avoid creating exclusive relationships with individual pupils or becoming the sole source of emotional support where this is not part of an agreed professional plan.

Where a pupil consistently seeks support from one particular member of staff, consideration should be given to whether additional strategies or wider team involvement would better support the pupil whilst maintaining appropriate professional boundaries.

### *Transparency*

Professional practice should always be capable of being openly explained and justified.

Staff should consider whether they would be comfortable explaining their actions to:

- the pupil's parent or carer;
- the Headteacher;
- the Designated Safeguarding Lead;
- colleagues; or
- an external inspector or safeguarding professional.

If a member of staff would feel uncomfortable explaining or recording their actions, they should reconsider whether those actions are appropriate.

### *Seeking Advice*

Orange Tree School recognises that safeguarding often requires professional judgement and that situations are not always straightforward.

Staff are encouraged to seek advice whenever they are uncertain about professional boundaries, rather than making assumptions or managing concerns in isolation.

Seeking advice is regarded as good professional practice and demonstrates a commitment to safeguarding, reflective practice and continuous professional learning.

The DSL or DDSL may contact the LADO for advice.

### *Professional Principle*

Orange Tree School values kindness, compassion and positive relationships. Staff are encouraged to build trusting relationships with pupils that promote safety, belonging and emotional wellbeing. However, kindness must always be exercised within professional boundaries. Professional relationships should empower pupils, promote resilience and independence, and never create dependency, favouritism or blurred boundaries.

## 10. Appropriate Physical Contact and Emotional Regulation

Orange Tree School recognises that many pupils require consistent, nurturing and trusting relationships in order to feel safe, regulate their emotions and engage successfully in learning.

Within a specialist SEND environment, staff may occasionally need to use appropriate physical contact as part of supporting pupils' emotional regulation, communication, learning, personal care, wellbeing or safety. Such contact may also occur in accordance with a pupil's Education, Health and Care Plan (EHCP), Behaviour Support Plan, Risk Assessment, Positive Handling Plan or other agreed support arrangements.

The school acknowledges that some pupils may spontaneously seek physical reassurance, including hugs or other comforting gestures, particularly during periods of distress, anxiety or

emotional dysregulation. Staff should not reject or shame a child who seeks comfort. The child's need for comfort should always be met. The professional's responsibility is to decide how that comfort can be provided safely, appropriately and within clear professional boundaries. However, any response must always be guided by professional judgement, the individual needs of the child and the principles set out in this policy.

Staff whose roles involve therapeutic, pastoral or emotional support, including therapists, ELSAs, mentors, pastoral staff and Learning Support Assistants, should remain particularly mindful of maintaining appropriate professional boundaries. These roles often involve supporting pupils at times of vulnerability or emotional dysregulation, which can increase the likelihood of pupils seeking comfort, reassurance or developing strong attachments. Staff should ensure that supportive relationships remain professional, transparent and focused on promoting the pupil's wellbeing, resilience and independence rather than dependency upon an individual adult.

Appropriate physical contact should always:

- be child-centred and in the best interests of the pupil;
- meet the child's emotional, developmental, educational or safety needs, never the emotional needs of the adult;
- be proportionate to the circumstances;
- respect the child's dignity, privacy, communication needs and personal preferences;
- take account of the child's age, developmental stage, SEND, known history and any trauma-informed approaches;
- be consistent with agreed support plans, School policies and staff training;
- be transparent and capable of being openly explained and justified; and
- promote the child's resilience, emotional regulation and independence;
- be reported and recorded where it is outside routine practice, repeated, prolonged, linked to an incident, or could reasonably be misunderstood, with sufficient factual detail to explain the context, rationale and action taken.

### *Supporting Emotional Regulation*

Staff working with pupils who experience emotional dysregulation should use the least intrusive and most appropriate strategies to support regulation.

Where physical reassurance is considered appropriate, staff should continually consider whether there are alternative approaches that would meet the child's needs whilst maintaining professional boundaries and promoting independence.

Support should be planned, consistent and, where appropriate, discussed as part of the pupil's wider support arrangements to ensure a shared understanding amongst those working with the child.

### *Hugs and Physical Reassurance*

Orange Tree School recognises that some pupils may seek hugs or other forms of physical reassurance from trusted adults.

Staff should respond thoughtfully and professionally, recognising that each situation is different and requires careful judgement.

Staff should not routinely initiate hugs or encourage pupils to seek comfort through physical contact unless this forms part of an agreed approach to meeting the child's individual needs.

Repeated, prolonged or exclusive physical reassurance that could create dependency upon an individual member of staff or give rise to perceptions of favouritism or blurred professional boundaries, should be avoided.

Where a pupil regularly seeks physical reassurance from one particular member of staff, this should be discussed with the Designated Safeguarding Lead (DSL), the Senior Leadership Team and, where appropriate, relevant therapeutic professionals to ensure that the approach remains appropriate, consistent and in the child's best interests.

#### *Staff Working in Therapeutic, Support and Pastoral Roles*

Orange Tree School recognises that Learning Support Assistants (LSAs), therapists, Emotional Literacy Support Assistants (ELSAs), mentors, pastoral staff and other professionals may routinely support pupils during periods of distress, anxiety, crisis or emotional dysregulation.

These roles require high levels of trust, sensitivity, consistency and professional skill. Staff working in these roles should remain particularly mindful of maintaining appropriate professional boundaries, recognising that pupils may develop strong attachments to trusted adults.

Supportive relationships should always:

- promote the pupil's wellbeing, resilience and independence;
- remain transparent and professionally accountable;
- avoid creating exclusive or dependent relationships;
- be discussed within the wider professional team where patterns of attachment emerge; and
- be reviewed where necessary to ensure safeguarding remains central to practice;
- be appropriately recorded where significant, repeated or unusual support has been provided, particularly where physical reassurance, heightened distress or emerging dependency is involved, in order to protect both the pupil and the member of staff.

#### *Professional Pause*

Before using physical contact, ask yourself.

- Is this in the child's best interests?
- Is this the least intrusive way of supporting the child?
- Does this promote regulation and independence rather than dependency?
- Is this consistent with the child's agreed support plan?
- Would I feel comfortable explaining my actions to a parent, colleague, the DSL or an inspector?

- Could my actions reasonably be misunderstood by someone observing them?
- If another trained colleague were here, would they consider this appropriate?

If the answer to any of these questions is uncertain, staff should seek advice from the DSL or a member of the Senior Leadership Team at the earliest opportunity.

## 11. Gifts, Rewards and Personal Items

Orange Tree School recognises that appropriate praise, encouragement and rewards play an important role in supporting pupils' learning, wellbeing and positive behaviour. However, staff must ensure that the use of gifts, rewards, food and personal items is always transparent, equitable and professionally accountable.

The giving of gifts or personal items can unintentionally create actual or perceived favouritism, dependency or blurred professional boundaries. Staff must therefore exercise professional judgement and follow the expectations set out in this policy.

### *11.1 Purpose*

This section provides guidance to ensure that rewards and acts of kindness are:

- child-centred and in the best interests of the pupil;
- fair, transparent and consistent;
- professionally accountable;
- free from actual or perceived favouritism;
- consistent with the school's values and safeguarding responsibilities.

Kindness is one of Orange Tree School's core values; however, kindness must always be exercised within professional boundaries.

### *11.2 Rewards and Recognition*

Staff are encouraged to recognise pupils' achievements, effort and positive behaviour through the school's agreed systems of praise and reward.

Rewards should:

- support learning, wellbeing or positive behaviour;
- be appropriate to the pupil's age, needs and individual circumstances;
- be fair and consistent;
- be capable of being openly explained and justified; and
- wherever possible, form part of the school's agreed reward systems.

Rewards should never create dependency upon an individual member of staff or give rise to perceptions of favouritism.

### *11.3 Gifts*

Staff should not purchase gifts, food, clothing, toys or other personal items for individual pupils using their own money.

Where a gift or reward is considered appropriate, it should:

- have a clear educational, therapeutic, pastoral or safeguarding purpose;
- normally be purchased using School funds;
- be agreed in advance by the Headteacher or another authorised member of the Senior Leadership Team;
- be recorded where appropriate; and
- be provided in a manner that is fair, transparent and professionally accountable.

Exceptional circumstances should be discussed with the Headteacher before any gift is given.

#### *11.4 Bringing Items from Home*

Staff should not routinely bring personal belongings from home for individual pupils.

This includes, but is not limited to:

- toys;
- books;
- clothing;
- games;
- comfort items;
- stationery;
- personal equipment; or
- any other item intended for an individual pupil.

Where an item from home may provide significant educational or therapeutic benefit, prior approval should be obtained from a member of the Senior Leadership Team, and the reasons should be clearly documented where appropriate.

#### *11.5 Food and Treats*

The school recognises that food may occasionally form part of curriculum activities, celebrations or agreed behaviour support.

However, staff should not routinely purchase food, sweets or drinks for individual pupils or groups of pupils using their own money.

Any food provided should:

- comply with the school's policies and procedures;
- take account of allergies, dietary requirements and medical needs;
- be appropriate to the activity or occasion;
- be available fairly and consistently; and
- avoid creating actual or perceived favouritism.

Staff should never use food in a way that could compromise professional boundaries or undermine agreed behaviour support approaches.

### *11.6 Exceptional Circumstances*

Orange Tree School recognises that exceptional situations may arise where additional flexibility is appropriate.

In such circumstances:

- the child's best interests must remain the primary consideration;
- the proposed action should be discussed with a member of the Senior Leadership Team in advance wherever practicable;
- decisions should be transparent and capable of being justified;
- appropriate records should be maintained where necessary; and
- consideration should be given to how the action may be perceived by pupils, parents, carers and colleagues.

Exceptional circumstances should remain the exception rather than the norm.

### *Professional Pause*

Before giving a pupil, a gift, reward, treat or personal item, ask yourself:

- Why am I doing this?
- Is this in the child's best interests?
- Would I do the same for another pupil in similar circumstances?
- Has this been agreed through the school's procedures?
- Could this unintentionally create dependency or favouritism?
- Would I feel comfortable explaining this decision to a parent, the Headteacher, the DSL or an inspector?

If you are uncertain, seek advice before proceeding.

### *Professional Principle*

Acts of kindness can have a lasting positive impact on children. At Orange Tree School, kindness is encouraged, but it must always be exercised within professional boundaries. Rewards and gifts should support pupils' learning, wellbeing and development whilst remaining transparent, equitable and professionally accountable.

## **12. Recognising Attachment, Dependency and Favouritism**

Orange Tree School recognises that strong, trusting relationships are fundamental to supporting pupils' learning, wellbeing and emotional development. Within a specialist SEND environment, pupils may naturally form close attachments to adults who provide consistent care, reassurance and support.

Healthy professional relationships help pupils to feel safe, valued and understood. However, staff must remain aware that, without appropriate professional boundaries, these relationships can unintentionally develop into dependency, favouritism or over-reliance on an individual member of staff.

Maintaining appropriate professional boundaries helps ensure that relationships remain therapeutic, supportive and focused on the child's long-term wellbeing and independence.

### *Healthy Attachment*

Positive attachment is an important part of effective practice. Staff should strive to develop relationships that:

- help pupils feel safe, respected and valued;
- promote trust and emotional security;
- support learning, emotional regulation and personal development;
- encourage resilience, confidence and independence;
- remain consistent with professional boundaries; and
- are transparent and understood by the wider staff team.

Healthy attachment should empower pupils rather than increase reliance on a single adult.

### *Recognising Dependency*

Dependency can develop gradually and may not always be immediately recognised. Staff should remain professionally curious and reflect on whether a relationship continues to meet the child's best interests.

Possible indicators of dependency may include:

- a pupil consistently seeking one particular member of staff in preference to all others;
- distress or refusal to engage when that member of staff is absent;
- reluctance to accept support from other trusted adults;
- repeated requests for exclusive attention or reassurance;
- increasing reliance on one adult to resolve situations that could be managed more independently; or
- a member of staff feeling personally responsible for meeting all of a pupil's emotional needs.

These situations do not necessarily indicate inappropriate practice, but they should prompt reflection, discussion and, where appropriate, shared planning.

### *Avoiding Favouritism*

All pupils should be treated fairly, consistently and with equal respect.

Staff should avoid behaviours that could create, or be perceived as creating, favouritism. This includes:

- giving one pupil significantly more time or attention than others without a clear professional reason;
- providing rewards, gifts or privileges outside agreed school procedures;
- regularly spending time alone with one pupil where this is not professionally justified;
- creating exclusive routines or rituals with individual pupils;
- communicating differently with one pupil in a way that could reasonably be perceived as preferential treatment; or
- allowing professional boundaries to become blurred through familiarity.

Staff should remember that the perception of favouritism can be as damaging to trust and confidence as actual favouritism.

### *A Team Approach*

Supporting pupils should never rely solely on one member of staff.

Where strong attachments develop, staff should work collaboratively to:

- share responsibility for supporting the pupil;
- encourage relationships with a wider range of trusted adults;
- ensure approaches are consistent across the staff team;
- review support strategies where necessary; and
- seek advice from the DSL, SENCO, therapists or senior leaders where appropriate.

A collaborative approach promotes continuity of care while reducing the risk of dependency.

Where there is evidence that a pupil is becoming overly dependent upon a particular member of staff, or where professional boundaries may be at risk of becoming blurred, the Designated Safeguarding Lead (DSL) and/or the Senior Leadership Team may review staffing arrangements. This may include gradually broadening the pupil's support network, adjusting responsibilities or reallocating aspects of support to other appropriately trained members of staff. Such decisions will always be made in the best interests of the child whilst also protecting the wellbeing, professional integrity and safeguarding of the staff member concerned.

The school also recognises that parents and carers may naturally develop trusting relationships with individual members of staff, particularly where those staff have provided consistent support over time. Whilst these relationships are valued, they should not create an expectation that one particular member of staff will always be available to support a child.

Orange Tree School operates as a collaborative team. Decisions about staffing, key workers and pupil support arrangements are made in the best interests of the child, taking account of safeguarding, educational needs, staff wellbeing and the effective operation of the school. Where changes to staffing arrangements are necessary, the school will seek to manage these sensitively and communicate appropriately with families.

Parents and carers are encouraged to develop confidence in the wider professional team. This helps promote consistency for pupils, supports continuity of care and reduces the risk of dependency on individual members of staff.

Maintaining a team-based approach protects pupils, supports healthy professional relationships and helps ensure that no child or family becomes reliant upon the availability of a single member of staff.

#### *Professional Pause*

Staff should regularly reflect on their professional relationships with pupils and ask themselves:

- Am I promoting this child's independence?
- Could another trusted adult provide this support?
- Am I maintaining appropriate professional boundaries?
- Could my actions reasonably be perceived as favouritism?
- Is this relationship transparent and understood by colleagues?
- Have I discussed any emerging concerns with my line manager or the DSL?

Reflection is an important safeguarding practice and should be viewed as a positive aspect of professional responsibility.

#### *When to Seek Advice*

Staff should seek advice from the Designated Safeguarding Lead (DSL), their line manager or a member of the Senior Leadership Team where they are concerned that:

- a pupil has become overly dependent upon them;
- professional boundaries may be becoming blurred;
- a pattern of attachment is emerging;
- colleagues have expressed concerns about a relationship; or
- they are uncertain how best to meet a pupil's emotional needs whilst maintaining appropriate professional boundaries.

Seeking advice at an early stage is encouraged and should be viewed as a strength. Early discussion enables appropriate support to be provided for both pupils and staff, helping to maintain safe, professional and effective relationships.

#### *Professional Principle*

Children benefit from trusted relationships with caring adults. The aim of those relationships is not to create dependence, but to build confidence, resilience and independence. Every interaction should help a child become more secure in themselves, not more reliant on one particular adult.

## 13. Identifying Low-Level Concerns

Orange Tree School is committed to fostering a culture where concerns about professional conduct are recognised and addressed at the earliest possible opportunity.

Low-level concerns are often identified through day-to-day professional interactions, observations or conversations. Whilst a single incident may appear minor in isolation, it may indicate a lapse in professional judgement or form part of a wider pattern of behaviour. Early recognition and reporting support reflective practice, helps maintain professional standards and contributes to a strong safeguarding culture.

Staff should not dismiss concerns because they appear insignificant or because they are unsure whether a threshold has been met. If in doubt, the concern should be shared.

#### *What Might Constitute a Low-Level Concern?*

A low-level concern may arise where the behaviour of an adult working in or on behalf of the school:

- is inconsistent with the Staff Code of Conduct or expected professional standards;
- falls below the standards expected by the school, even if not considered abusive;
- demonstrates poor professional judgement;
- creates actual or perceived blurred professional boundaries;
- could undermine confidence in the adult's professional conduct;
- causes another member of staff to feel uncomfortable or concerned; or
- represents a pattern of behaviour that, when viewed cumulatively, may indicate a greater safeguarding concern.

The examples below are intended to support professional judgement and are not exhaustive.

#### *Examples of Low-Level Concerns*

Examples may include, but are not limited to:

- using inappropriate or unprofessional language;
- displaying inconsistent professional boundaries;
- showing actual or perceived favouritism;
- unnecessary or excessive one-to-one contact with a pupil;
- repeatedly placing themselves in situations where they are alone with a pupil without clear justification;
- sharing unnecessary personal information with pupils;
- failing to follow agreed safeguarding procedures or school expectations;
- inappropriate use of technology or communication systems;
- giving gifts, food or personal items outside agreed procedures;
- accepting inappropriate familiarity from pupils;
- poor judgement regarding physical contact;
- behaviour that makes colleagues feel uneasy, even where they cannot clearly explain why; or
- any conduct that, whilst not meeting the threshold for harm, is inconsistent with Orange Tree School's professional values and expectations.

#### *Professional Curiosity*

Staff should exercise professional curiosity when observing the conduct of colleagues.

This means being prepared to notice changes in behaviour, recognise patterns and respectfully question situations that appear unusual or inconsistent with expected professional practice.

Professional curiosity is not about making assumptions or accusations. It is about remaining observant, reflective and willing to seek advice whenever something does not feel right or cannot easily be explained.

### *Considering the Wider Context*

When identifying low-level concerns, staff should consider:

- whether this is an isolated incident or part of a developing pattern;
- whether the behaviour could reasonably be misunderstood by others;
- whether the conduct is consistent with the Staff Code of Conduct and this policy;
- whether professional boundaries have been maintained;
- whether the behaviour is in the child's best interests; and
- whether advice should be sought before concerns escalate.

Early discussion often enables concerns to be addressed through support, guidance and reflective practice before more significant issues arise.

### *Professional Pause*

If you observe something that makes you feel uncomfortable, ask yourself:

- What have I actually observed?
- Why has this caught my attention?
- Is the behaviour consistent with our professional standards?
- Could this be perceived as inappropriate by others?
- Is this an isolated incident or part of a wider pattern?
- Have I discussed my observations with the appropriate person?

If you remain unsure, seek advice. It is always better to share a concern than to dismiss it.

### *Professional Principle*

Low-level concerns are not about finding fault. They are about recognising opportunities to protect children, support colleagues and maintain the highest standards of professional practice. A culture where concerns are shared early is a culture where safeguarding is strengthened.

## 14. Reporting Low-Level Concerns

Orange Tree School is committed to creating a culture in which staff feel confident and supported to report low-level concerns at the earliest opportunity.

All adults working in or on behalf of the school have a professional responsibility to report concerns about the conduct of colleagues where that conduct may fall below the expected standards of professional behaviour. Prompt reporting enables concerns to be considered fairly, proportionately and, where appropriate, addressed through support, guidance or further investigation.

Concerns should be reported regardless of how minor they may appear or whether the individual reporting them is certain that the behaviour constitutes a low-level concern.

### *Reporting Responsibilities*

All staff, volunteers, members of the Advisory Board, contractors and other adults working on behalf of the school are expected to report low-level concerns promptly.

Concerns should normally be reported to the Headteacher.

Where the concern relates to the Headteacher, it should be reported directly to the Chair of the Advisory Board.

Where the concern relates to the Chair of the Advisory Board, it should be reported to the Proprietor where this is a different individual. Where the Chair and Proprietor are the same person, or where independent oversight is otherwise required, advice should be sought from the LADO and the concern referred to an appropriately independent person or body in accordance with the school's safeguarding and governance arrangements.

If a member of staff is uncertain whether a concern meets the threshold for reporting, they should seek advice rather than deciding not to report it.

### *Self-Reporting*

Orange Tree School encourages a culture of openness, honesty and reflective practice.

Staff are encouraged to self-report where they believe they may have exercised poor professional judgement, made an error or acted in a way that could be perceived as inconsistent with the Staff Code of Conduct or professional boundaries.

Self-reporting demonstrates professionalism, integrity and a commitment to safeguarding.

Where appropriate, self-reporting will be considered positively as part of any subsequent discussion or management of the concern.

### *How Concerns May Be Raised*

Low-level concerns may be raised:

- in person;
- by email;
- in writing;
- during supervision or line management meetings; or
- through any other agreed reporting route within the school.

Wherever possible, concerns should be recorded in writing to ensure an accurate record is maintained.

The person reporting the concern should provide factual information about what they observed or experienced and avoid speculation or assumptions.

#### *Anonymous Concerns*

Anonymous concerns will be considered where sufficient information is provided to enable appropriate enquiries to be made.

However, anonymous reporting may limit the school's ability to investigate thoroughly or provide feedback to the person raising the concern.

Where possible, staff are encouraged to identify themselves so that appropriate support, clarification and protection can be provided throughout the process.

#### *What Happens Next?*

Every reported low-level concern will be considered on its own merits.

The Headteacher (or Chair of The Advisory Board, where appropriate) will consider:

- the nature and context of the concern;
- whether the behaviour represents a low-level concern or meets the threshold for managing an allegation;
- whether immediate safeguarding action is required;
- whether further information is needed;
- whether support, guidance or informal management is appropriate; and
- whether there are any previous concerns that, when viewed cumulatively, indicate a developing pattern.

Each concern will be assessed fairly, objectively and in accordance with statutory guidance.

#### *Raising Concerns in Good Faith*

Staff who report concerns in good faith will be supported by the School.

No member of staff will be disadvantaged or treated unfavourably for raising a genuine concern, even where the concern is ultimately found to be unfounded.

Deliberately false, malicious or vexatious reports may, however, be managed through the school's disciplinary procedures.

### *Professional Pause*

Before reporting a concern, ask yourself:

- What have I observed or become aware of?
- Am I reporting facts rather than assumptions?
- Have I acted promptly?
- Does this concern relate to professional conduct or safeguarding?
- If I am unsure, who can I speak to for advice?

Remember, you are not expected to investigate concerns yourself. Your responsibility is to recognise concerns and report them appropriately.

### *Professional Principle*

Reporting a low-level concern is not an accusation. It is a professional safeguarding responsibility that helps protect children, supports colleagues and strengthens the culture of openness, accountability and continuous improvement at Orange Tree School.

*Where a member of staff is unsure how to raise a concern or believes it cannot be reported through the usual management structure, they should refer to the School's Speaking Up (Whistleblowing) Policy and the accompanying Your Voice Matters guidance.*

## 15. Responding to Low-Level Concerns

Orange Tree School is committed to responding to all reported low-level concerns in a fair, timely, proportionate and consistent manner.

Every concern will be considered objectively, taking account of the context, available information and the need to safeguard pupils whilst ensuring that staff are treated fairly and with respect.

The purpose of responding to low-level concerns is not to apportion blame, but to promote safe professional practice, support reflective learning and address concerns before they escalate.

### *Initial Consideration*

Upon receiving a low-level concern, the Headteacher (or Chair of the Advisory Board where appropriate) will consider:

- the nature and context of the concern;
- whether the behaviour is consistent with the definition of a low-level concern;

- whether the concern meets the threshold for managing an allegation or other safeguarding procedures;
- whether any immediate safeguarding or management action is required;
- whether further information is needed to understand the circumstances; and
- whether there are any previous concerns that, when viewed together, suggest a developing pattern of behaviour.

Where there is any doubt about the appropriate threshold, advice will be sought from the Local Authority Designated Officer (LADO) or other appropriate safeguarding professionals in accordance with statutory guidance.

### *Proportionate Response*

The school recognises that not all concerns require the same response.

Depending on the circumstances, a low-level concern may be managed through:

- supportive professional discussion;
- reflective supervision;
- clarification of expectations;
- additional guidance or training;
- informal management advice;
- formal management action where appropriate;
- referral to other internal procedures; or
- escalation to the school's allegations procedures where further information indicates that the threshold has been met.

Responses will always be proportionate to the nature and seriousness of the concern.

### *Supporting Staff*

Orange Tree School recognises that raising or being the subject of a low-level concern can be an anxious experience.

Staff involved in the process will be treated with professionalism, dignity and respect.

Where appropriate, support may include:

- opportunities to discuss the concern;
- access to advice from managers or the DSL;
- appropriate wellbeing support;
- opportunities for reflection and professional learning; and
- clear communication regarding the outcome of the process, where appropriate and lawful.

The school is committed to fostering a culture in which staff feel able to learn from mistakes and seek support without fear, whilst maintaining high standards of professional conduct and safeguarding.

### *Learning and Improvement*

Low-level concerns provide valuable opportunities for professional reflection and organisational learning.

Where appropriate, the school will consider whether concerns identify:

- a need for additional staff guidance or training;
- opportunities to strengthen professional practice;
- emerging themes and patterns;
- improvements to policies or procedures; or
- wider safeguarding lessons that should be shared across the school.

Learning from low-level concerns contributes to continuous improvement and helps strengthen the school's safeguarding culture.

### *Escalation*

If, during consideration of a low-level concern, further information suggests that the behaviour may have:

- harmed, or may have harmed, a child;
- committed or potentially committed a criminal offence against or related to a child;
- behaved towards a child 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,

the concern will no longer be managed as a low-level concern. Instead, it will be managed under the School's Allegations Against Staff procedures, in accordance with Keeping Children Safe in Education (KCSIE) and relevant statutory guidance.

### *Professional Pause*

When responding to a low-level concern, leaders should ask themselves:

- Have I considered all the available information?
- Is my response fair, proportionate and consistent?
- Have I distinguished between a one-off lapse in judgement and a developing pattern?
- Does this response protect children whilst supporting professional learning?
- Have I considered whether wider organisational learning could arise from this concern?

### *Professional Principle*

Responding to low-level concerns is about creating opportunities for learning, reflection and early intervention. A fair, proportionate and transparent response protects children, supports staff and reinforces a culture of continuous professional improvement.

## 16. Recording and Record Keeping

Orange Tree School recognises that accurate, factual and secure record keeping is an essential part of effective safeguarding practice.

All reported low-level concerns will be recorded appropriately to ensure that concerns can be reviewed, monitored and considered alongside any previous information. Maintaining clear records helps the school identify patterns of behaviour, support fair decision-making and demonstrate compliance with statutory safeguarding expectations.

Records will be created regardless of whether the concern is ultimately substantiated, unsubstantiated or resolved through informal management.

### *Recording Low-Level Concerns*

The Headteacher (or Chair of the Advisory Board where appropriate) will ensure that an appropriate written record is made of each reported low-level concern.

Records must contain sufficient factual detail to enable another professional, at a later date, to understand what occurred, the relevant context, why decisions were made and what action was taken.

Records should include, where appropriate:

- the date the concern was reported;
- the name of the individual(s) involved;
- a factual account of the concern;
- any immediate action taken;
- discussions held with relevant individuals;
- the outcome of the consideration;
- any advice, guidance or support provided;
- any follow-up actions agreed; and
- the rationale for decisions made.

Records should distinguish clearly between factual information, professional observations and opinion.

### *Quality of Records*

All records should be:

- factual, objective and evidence-based;
- clear, accurate and contemporaneous wherever possible;

- free from unnecessary opinion or speculation;
- respectful and professionally written;
- stored securely; and
- retained in accordance with statutory guidance and the School's Data Protection and Records Retention policies.

### *Identifying Patterns*

One of the principal purposes of maintaining records is to enable the School to identify cumulative concerns.

A behaviour that appears to be a one-off lapse in professional judgement may, when considered alongside previous concerns, indicate a pattern requiring further management or safeguarding action.

The Headteacher will periodically review records to identify:

- repeated low-level concerns involving the same individual;
- recurring themes or behaviours;
- emerging safeguarding risks;
- organisational learning opportunities; and
- any concerns that require escalation.

### *Access to Records*

Records relating to low-level concerns will be treated as confidential and will only be accessible to those who have a legitimate professional need to know.

Information will be shared in accordance with:

- Keeping Children Safe in Education (KCSIE);
- UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018;
- the School's Data Protection Policy; and
- any other relevant statutory guidance.

### *Record Retention*

Low-level concern records will be retained securely in accordance with statutory requirements, employment legislation and the School's Records Retention Schedule.

Where an individual leaves the school, records will be managed in accordance with statutory guidance and any applicable safeguarding or employment requirements.

### *Professional Principle*

Accurate records protect everyone. They enable the school to identify patterns, make fair decisions, support professional learning and ensure that safeguarding concerns are managed consistently, transparently and in the best interests of children.

## 17. Confidentiality and Information Sharing

Orange Tree School recognises that concerns relating to professional conduct are sensitive and must be managed with appropriate levels of confidentiality whilst ensuring that safeguarding responsibilities are fulfilled.

Information relating to low-level concerns will only be shared with those who have a legitimate professional need to know in order to safeguard children, fulfil statutory responsibilities or manage the concern appropriately.

Confidentiality should not prevent concerns from being reported, discussed or shared where doing so is necessary to protect children or comply with legal or safeguarding obligations.

### *Managing Information*

Those responsible for managing low-level concerns will ensure that information is:

- handled sensitively, respectfully and securely;
- shared only on a need-to-know basis;
- recorded and stored securely;
- managed in accordance with data protection legislation;
- retained in line with the School's Records Retention Schedule; and
- used only for legitimate safeguarding, employment or governance purposes.

### *Information Sharing*

Information relating to low-level concerns may be shared where:

- it is necessary to safeguard a child;
- there is a legal or statutory duty to do so;
- advice is required from the Local Authority Designated Officer (LADO) or other safeguarding professionals;
- information forms part of safer recruitment or employment processes where permitted by law; or
- disclosure is otherwise lawful and proportionate.

The school will always seek to balance the rights of individuals with its overriding responsibility to safeguard children and promote their welfare.

### *Expectations of Staff*

Staff involved in a low-level concern should:

- respect the confidentiality of the process;
- avoid discussing concerns with colleagues who do not have a legitimate need to know;
- refrain from speculation, gossip or sharing personal opinions;
- cooperate openly and honestly with any enquiries; and
- seek support through appropriate management channels where required.

Maintaining confidentiality protects the integrity of the process and supports fair and objective decision-making.

#### *Professional Principle*

Confidentiality protects people; it should never prevent safeguarding. Information should always be shared responsibly, lawfully and in the best interests of children.

## 18. Monitoring, Review, Training and Organisational Learning

Orange Tree School is committed to maintaining an open, reflective and continuously improving safeguarding culture.

The implementation of this policy will be monitored by the Headteacher, Designated Safeguarding Lead (DSL) and the Advisory Board to ensure that it remains effective, reflects current statutory guidance and supports the highest standards of professional conduct.

#### *Monitoring*

The school will monitor:

- the number and nature of low-level concerns reported;
- emerging themes and patterns;
- the effectiveness of responses;
- compliance with reporting expectations;
- staff confidence in raising and discussing concerns; and
- opportunities for organisational learning and improvement.

Monitoring will help ensure that concerns are identified early and managed consistently across the school.

#### *Training and Awareness*

All staff will receive appropriate safeguarding training, including:

- recognising low-level concerns;
- maintaining professional boundaries;
- reporting procedures;
- professional curiosity;
- reflective practice; and

- the importance of creating a culture where concerns are raised promptly and appropriately.

This policy will form part of staff induction and will be revisited through safeguarding updates, supervision and ongoing professional development.

### *Organisational Learning*

Orange Tree School is committed to learning from experience.

Themes arising from low-level concerns will be considered to determine whether improvements are required to:

- policies and procedures;
- staff training;
- supervision arrangements;
- safeguarding practice;
- communication; or
- wider school systems.

Learning will be shared appropriately to strengthen safeguarding practice whilst maintaining confidentiality.

### *Policy Review*

This policy will be reviewed annually, or sooner if:

- statutory guidance changes;
- lessons are learned from safeguarding practice;
- recommendations arise from inspections or audits; or
- organisational changes require amendment.

This policy may also be reviewed following significant safeguarding incidents, learning reviews or changes to local safeguarding arrangements.

Staff will be informed of any significant revisions.

### *Professional Principle*

A strong safeguarding culture is built through openness, reflection and continuous learning. Every concern, every conversation and every opportunity to learn helps strengthen the safety and wellbeing of our pupils and our professional community.

## 19. Related Policies

This policy should be read alongside, and in conjunction with, the following School policies and procedures:

## Safeguarding

- Child Protection and Safeguarding Policy
- Speaking Up (Whistleblowing) Policy
- Staff Code of Conduct
- Safer Recruitment Policy

## Behaviour and Professional Practice

- Relationship and Behaviour Policy
- Positive Handling / Physical Intervention Policy

## Technology

- Online Safety Policy
- Mobile Phone Use Policy

## Governance

- Data Protection Policy
- Disciplinary Policy
- Complaints Policy
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy

## *Our Commitment*

*At Orange Tree School, safeguarding is everyone's responsibility. We believe that children are best protected in a culture where professional relationships are built on kindness, respect, transparency, accountability and trust. By maintaining professional boundaries, exercising sound judgement and speaking up when concerns arise, we work together to create a safe environment in which every child can flourish.*