



Whistleblowing and Low-level Concern Policy and Procedures

Purpose

This policy is written for people working at the London Vocational Ballet School and sets out how we respond to whistleblowing disclosures and low-level concerns. It should be read in conjunction with the School's Child Protection and Safeguarding Policy, Keeping Children Safe in Education 2026 (KCSIE 2026), data protection policies, Managing Allegations about Staff, including Supply Staff, Trainee Teachers, Trustees, Volunteers and Contractors 2026–27, and the LVBS Staff Handbook, including the Code of Professional Conduct.

Whistleblowing

If an employee, worker or agency member has a serious concern about the School, we want to know and will take appropriate action.

Where a concern is in the public interest your rights are protected by law.

This policy sets out the steps you **must** follow to raise a concern about something that has happened, is happening now, or may happen in the future.

If you are a volunteer, which includes charity trustees, or a self-employed professional you are not covered by the Public Interest Disclosure Act, however the school encourages everyone to raise their concerns if they have them in order that they can be investigated to ensure that the school and its staff are acting appropriately.

Trustees should raise safeguarding concerns and allegations in accordance with the reporting routes in this policy and the Managing Allegations policy. Where a matter is also a serious incident involving the charity, it must be reported to the Charity Commission in accordance with the Commission's serious incident reporting requirements; [Charity Commission's serious incident reporting process](#)

Ofsted may also be contacted where appropriate.

What is covered

You're protected by this policy and by law if you report any of the following:

- a criminal offence, e.g. fraud

- a breach of legal obligation, e.g. misuse of funds

- someone's health and safety is in danger
- risk or actual damage to the environment

- a miscarriage of justice

- you believe someone is covering up wrongdoing

Personal grievances (e.g. bullying, harassment, discrimination) are still important, but do not come under whistleblowing legislation – these should be reported through the grievance procedure.

Children first

Where there is reason to suspect that a child is suffering, or is likely to suffer, harm, everyone must act without delay to safeguard the child. The School's Child Protection and Safeguarding Policy must be followed. Concerns or allegations about an adult working with children must be reported through the routes set out in the Managing Allegations policy and, where the harm threshold may be met, the Local Authority Designated Officer (LADO) must be contacted without delay. Children's social care and/or the police must also be contacted where appropriate.

Our principles

We see it as your professional duty to raise concern if you strongly suspect wrongdoing. Anyone considering making a whistleblowing disclosure may seek advice and support from their trade union. The safety of everyone here comes above our loyalty to the organisation.

Any concern raised will be taken seriously by the school and a proper response given.

Concerns must be treated confidentially by both the person raising the concern and the school while they are being investigated.

Everyone's right to privacy will be respected during and after the investigation.

There will be no repercussions for matters raised under the whistleblowing policy, whether upheld or not. Where necessary, other staff will be instructed not to treat whistleblowers differently – any differential treatment, victimisation or intimidation of a

whistleblower may be considered gross misconduct.

The school will still consider concerns raised anonymously but will decide whether to investigate based on the seriousness of the allegation, the sufficiency of detail provided, the credibility of the concern and the likelihood of being able to gather sufficient evidence to make a finding. We'd prefer you raise the concern with your name but ask this is treated confidentially.

What you must do

Whistleblowing concerns that do not relate to the conduct of an adult towards children should normally be reported to the Directors or, where this is not possible or appropriate, to the nominated trustee for whistleblowing. Any safeguarding concern or allegation about a member of staff, supply staff member, trainee teacher, trustee, volunteer, contractor or premises user must be reported without delay to the Academic Director/headteacher. Where the concern or allegation is about the Academic Director/headteacher, it must be reported to the Chair of Trustees, without first informing the Academic Director/headteacher. Where there is a conflict of interest in reporting to the Academic Director/headteacher or Chair of Trustees, the concern must be reported directly to the LADO.

A person who reasonably believes that the matter will not be dealt with properly, has already raised it without an adequate response, or is worried about unfair treatment may make a protected disclosure to an appropriate person. Relevant routes may include the Charity Commission on 0300 066 9197 [prescribed organisation](#), Ofsted on 0300 123 1231, and the police where a crime may have been committed. Staff may also seek independent safeguarding advice through the NSPCC Whistleblowing Advice Line on 0800 028 0285 or help@nspcc.org.uk.

Nothing in this policy prevents a worker from making a lawful protected disclosure to an appropriate prescribed person or obtaining independent legal or trade union advice. Disclosures should be made confidentially

and responsibly. Staff should not use social media or the media to disclose confidential safeguarding or personal information and should seek advice before considering any wider disclosure.

You do not need to prove that something has happened, although if you have any evidence of the wrongdoing you should provide this. Instead, we need you to explain clearly why you think there may be wrongdoing. We will then consider how to go forward.

It is helpful to put your concern in writing, being clear about what you are concerned about, together with any evidence you may have to support your view.

Concerns can be anonymous, but this inhibits investigation. Concerns are taken seriously, confidentially, without repercussions.

Steps for responding to a concern

We will reassure any whistleblower that we have heard the concern, will investigate and that this will not affect their position at work (whether or not the concern later proves unjustified). We recognise that taking such action can be stressful, so will consider with the whistleblower the support they might need, including access to a counselling service.

The whistleblower will be provided with a copy of this policy and reminded of their right to contact their trade union or professional association for advice or support if they so wish.

We will consider immediately whether the information is a safeguarding concern, a low-level concern, or an allegation that may meet the harm threshold. The School will follow its Child Protection and Safeguarding Policy and Managing Allegations policy and will contact the LADO, children's social care and/or the police where required.

If at this stage, or at any point, there are grounds to suspect that a criminal offence has occurred, the police must

be contacted. The School must agree with the police and, where relevant, the LADO what enquiries may be undertaken so that a criminal or safeguarding investigation is not prejudiced.

A plan for investigating the concern will be set out. This should take into account the seriousness and urgency of the allegation. We will consider whether we believe this is a whistleblowing allegation (i.e. in the public interest) or a personal grievance. The plan will set out on how to gather evidence about the concern.

An investigating officer will be identified by the Directors or, where the concern involves a Director, by the nominated trustee, provided that this does not conflict with the statutory safeguarding route above. They will contact you within two working days to explain what is happening. Usually, they will arrange a meeting to understand the concern. You are entitled to support from a trade union or professional association at this meeting. A copy of the minutes will be provided and will include a timescale for the investigation. Where the concern is a safeguarding allegation, only basic enquiries necessary to establish the facts will be undertaken before advice is obtained from the LADO.

The investigation can have four possible outcomes:

Action required – wrongdoing has been established and the school will rectify this, potentially including application of disciplinary or capability procedures (see those policies);

Legitimate misunderstanding – work is required to ensure both parties understand why there has been a misperception;

Personal grievance – advice to be given to follow this procedure rather than whistleblowing; or

Potentially malicious disclosure – where there is evidence that a person has deliberately made a false disclosure to deceive or cause harm, the matter may be considered under the disciplinary procedure. A concern that is unsubstantiated, unfounded or false is not malicious unless there is evidence of that deliberate intent.

When we have completed our enquiries, or if we require further time, we will tell you. We are limited in what we can share by our duty of confidence to other people, but we will aim to share sufficient information so that you are not worried anymore.

The outcome of any whistleblowing investigation, taking due account of individuals' right of confidentiality, will be shared with the trustees.

What if I'm still concerned?

Tell us. We will try to understand why you are worried and consider whether there is anything else we should do.

You can ask to speak to a more senior member of staff, ultimately to the Artistic Director or nominated trustee. We will listen carefully and where necessary trigger a further investigation.

If you believe that the School has not taken your concern seriously or the wrongdoing is continuing, you may contact an appropriate prescribed person, including the Charity Commission on 0300 066 9197 or Ofsted on 0300 123 1231. Safeguarding concerns may also be raised with the LADO, children's social care, the police or the NSPCC Whistleblowing Advice Line, [Charities](#), as appropriate.

Creating a safe culture

Every member of staff receives a copy of this policy at induction and when the policy is reviewed.

Any supply staff member, trainee teacher, volunteer, contractor, self-employed professional or temporary member of staff also receives or is directed to this policy when they start work with us.

We will agenda whistleblowing on team meeting agenda at least annually, talk through the importance of raising a concern at the earliest opportunity, the process to follow and where you can access this policy. Senior leaders will also refresh themselves on the process for investigating a whistleblowing concern set out above.

We seek to create a learning culture where anyone can speak out about something we can improve. We will provide opportunities to talk about concerns or improvements in team meetings and supervision. We will also be open to individual conversations.

While we will not always agree, we will work to ensure everyone feels listened to and action is always taken to correct wrongdoing.

The school will adopt a professional curiosity environment for all staff.

Unfair treatment

We will take all reasonable steps to ensure anyone raising a concern is treated fairly by the school and everyone working here.

If you believe you have been untreated fairly because of whistleblowing you should seek advice from your trade union, [citizens' advice](#), or the whistleblowing charity [public concern at work](#).

Who is responsible

The trustees are responsible for the whistleblowing policy and will review this document at least annually and whenever statutory guidance, legislation or local safeguarding arrangements change.

The Directors, or where appropriate the nominated trustee, are responsible for responding to general whistleblowing concerns. A senior manager who is independent of the concern may be identified to coordinate or investigate it. Safeguarding concerns and allegations about adults must follow the specific reporting and case-management routes in the School's Managing Allegations policy: the Academic Director/headteacher is the case manager, the Chair of Trustees acts where the concern is about the Academic Director/headteacher, and the LADO must be contacted directly where a conflict of interest prevents either route.

Megan Webster-Shaw, DSL, is the named SMT responsible for the whistleblowing policy.

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Low Level Concern policy and procedure

This policy should be read in conjunction with the school's Whistleblowing policy and the school's safeguarding policies, which include but are not exhausted:

Keeping Children Safe in Education
2026

All of the school's safeguarding
policies

Safer recruiting policy

Staff handbook

Equality and Diversity

Complaints procedure

GDPR policies

First aid & Mental health policy

Managing Allegations about Staff,
including Supply Staff, Trainee
Teachers, Trustees, Volunteers and
Contractors 2026–27

Every student has the right to be safe and protected. At LVBS our staff are recruited after undergoing rigorous recruitment procedures and training. As such at LVBS we create a secure, nurturing place where students are safe to mature; this is

underpinned by comprehensive policies and rigorous governance. We work in partnership with the student, their family and any agencies who need to be involved. We endeavour to achieve the best outcome for every student, knowing and understanding them and their needs. We are dedicated in supporting students' resilience in the demands of adult life and the careers that they may chose.

This policy aims to:

- Ensure that staff are clear about and confident to distinguish expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others, and the delineation of professional boundaries and reporting lines
- Empower staff to share any low-level concerns with the Safeguarding Lead, and to help all staff to interpret the sharing of such concerns as a neutral act
- Address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- Identify concerning, problematic or inappropriate behaviour, including any patterns, that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
- Provide for responsive, sensitive, and proportionate handling of such concerns when they are raised; and
- Help identify any weaknesses in our safeguarding systems

An Allegation

The term allegation applies where it is alleged that a member of staff, supply staff member, trainee teacher, trustee, volunteer, contractor, premises user or other person working in or on behalf of the School has:

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to

work with children. This includes behaviour outside the School and is known as transferable risk.

Where the harm threshold may be met, the concern or allegation must be reported without delay to the Academic Director/headteacher, who will act as case manager and contact the LADO. Before contacting the LADO, the case manager may undertake only basic enquiries to establish the facts and must not investigate the allegation. The School will not cease to use the services of a person because of an allegation without completing the safeguarding process. Where the person is supplied or employed by an agency, training provider or other business, the School shares the safeguarding duty with that organisation but remains responsible for fact-gathering and for the safeguarding process in accordance with Part Four of KCSIE 2026.

- Concerns or allegations about any adult working in or on behalf of the School must be referred without delay to the Academic Director/headteacher;
- Where the concern or allegation is about the Academic Director/headteacher, it must be referred to the Chair of Trustees, as the proprietor's representative, without first informing the Academic Director/headteacher; where there is a conflict of interest in reporting to either person, it must be referred directly to the LADO.

What is a Low- Level Concern?

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 in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

- Is not consistent with the School's Code of Professional conduct; and/or
- Relates to conduct outside work which may indicate that the adult is not suitable to work with children. Staff do not need to decide

whether a concern is a low-level concern or an allegation. The Academic Director/headteacher is the ultimate decision-maker and will determine the appropriate response, consulting the DSL as appropriate and the LADO where there is any doubt. A concern about a supply staff member, trainee teacher or contractor must also be notified to their employer, agency or training provider so that any potential patterns of inappropriate behaviour can be identified.

Who should staff share low-level concerns with?

Staff should share low-level concerns with the Academic Director/headteacher. Where the concern is about the Academic Director/headteacher, it must be shared with the Chair of Trustees. Where there is a conflict of interest in reporting to either person, it must be reported directly to the LADO. The DSL may support the process but is not the substitute case manager for an allegation about the Academic Director/headteacher.

Self-reporting by staff

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Professional Conduct. Self-reporting in these circumstances can be positive for a number of reasons:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived
- It is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

* LVBS has 'Confide' as their self reporting system and staff are trained on how to self-report.

Sharing and Recording Concerns

There are two ways that a low-level concern may be shared with the Academic Director/headteacher:

1) Speaking directly to the Academic Director/headteacher – where the low-level concern is provided verbally, an appropriate written record will be made contemporaneously or immediately following the discussion.

2) Emailing the Academic Director/headteacher – the email should include appropriate details. The Academic Director/headteacher must exercise sound professional judgement in determining what information is necessary to record for safeguarding purposes. The record should state the name and role of the individual sharing the concern and the name and role of the individual about whom it is raised. If the latter has an opposing factual view, this should be fairly recorded. The record should include brief context and concise, chronological, precise and accurate details of the concern and relevant incident(s). The record may be held in MyConcern's 'Confide' section.

Response from the Academic Director/headteacher

Once the Academic Director/headteacher has received the low-level concern, they should personally, or with appropriate support from the DSL:

- 1) Speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary has already been provided
- 2) Review the information and determine whether the behaviour:
 - a) Is entirely consistent with LVBS Code of Conduct and the law
 - b) Constitutes a low-level concern
 - c) Is serious enough to consider referral to the LADO;
 - d) When considered with any other low-level concerns previously raised about the same individual, meets the harm threshold and must be referred to the LADO and/or other relevant external agencies; or

3) Where the Academic Director/headteacher is in any doubt, they will seek advice from the LADO – on a no-names basis if appropriate.

4) Speak to the individual about whom the low-level concern has been raised unless advised not to do so by the LADO or another relevant external agency. Where the concern relates to supply staff, a trainee teacher or a contractor, the person's employer, agency or training provider must be involved as appropriate.

5) Make appropriate records of:

a) All internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses

b) All external conversations – for example, with the LADO/other external agencies

c) Their determination

d) The rationale for their decision

The Academic Director/headteacher's approach should also be informed by the following:

If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with LVBS's Code of Professional Conduct and the law:

1) It will still be important for the Academic Director/headteacher to inform the individual in question what was shared about their behaviour and give them an opportunity to respond;

2) In addition, the DSL should speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with LVBS's Code of Professional Conduct and the law

3) Such a situation may indicate that:

a. The Code of Professional Conduct is not clear

b. The briefing and/or training has not been satisfactory

c. If the same or a similar low-level concern is subsequently shared by the same or different individual, and the behaviour in question is also consistent with the Code of Professional Conduct, then an issue may

need to be addressed about how the subject of the concern's behaviour is being perceived, if not about the behaviour itself.

If it is decided that the current concern is low-level:

1) it should also be responded to in a sensitive and proportionate way, on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns should be done discreetly and, on a need,-to-know basis

2) Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training

3) In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. Any such conversation should: a. Identify why their behaviour is concerning, problematic or inappropriate

b. Explain what change is required in their behaviour

c. Enquiring what, if any, support they might need in order to achieve and maintain that required alteration.

d. Describe the consequences if they fail to reach the required standard or repeat the behaviour in question

e. Consider whether ongoing and transparent monitoring of the individual's behaviour may be appropriate

f. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

4) Any such meeting will be followed up in writing to ensure that there is no misunderstanding

Some low-level concerns may also raise issues of misconduct or poor performance. The Academic Director/headteacher should consider whether this is the case, taking

account of any advice from the LADO. Referrals into employment procedures must be made by the Academic Director/headteacher, not by individual staff members. There must be appropriate liaison and information sharing with the DSL and, for supply staff, trainee teachers and contractors, with the relevant employer, agency or training provider, so that patterns can be identified and a holistic view taken. Some concerns may trigger the School's disciplinary, complaints or whistleblowing procedures. Where there is doubt about whether the harm threshold is met, the LADO will be consulted. When a concern, considered alone or with other low-level concerns about the same individual, meets the harm threshold, it will be reclassified and managed under the Child Protection and Safeguarding Policy, the Managing Allegations policy and Part Four of KCSIE 2026.

Low-level Concerns' Records

All low-level concerns will be recorded in writing on the School's MyConcern system, including those subsequently determined to relate to behaviour entirely consistent with the Code of Professional Conduct. Records will include the details of the concern, the context in which it arose, and the action taken, together with the name of the individual sharing the concern; if the individual wishes to remain anonymous, that will be respected as far as reasonably possible. Records will be kept confidential, held securely and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the School will decide whether disciplinary procedures should be followed or whether the behaviour meets the harm threshold and should be referred to the LADO. For supply staff, trainee teachers and contractors, the relevant employer, agency or training provider will be notified of the concern and its outcome. Low-level concern records will be retained at least until the individual leaves the School's employment or engagement. References will include only substantiated safeguarding

allegations and will not include low-level concerns unless they relate to issues that would normally be included in an employment reference.

Approval body: LVBS Trustees & Directors

Date: September 2026

Review Schedule: 1 year

Next review date: September 2027