

Low Level Concerns Policy and Guidance

'Let your light shine!'



Aspire Federation

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(Executive Headteacher)

Date...22.9.26

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Contents

1. Introduction
2. Summary
3. Keeping Children Safe in Education September 2026
4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct
5. Storing and use of Low-Level Concerns and follow-up information
6. Process to follow when a Low-Level Concern is raised
7. Low Level Concern Form

1. Introduction

At St. George's C of E Primary and William Hildyard C of E Primary and Nursery Schools, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos.

This policy applies to employees, agency staff, supply teachers, volunteers, governors, trustees, contractors and anyone working on behalf of the school. It should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies. This policy will be reviewed by the Executive Headteacher, Heads of Schools and full governing body at least annually, or more frequently, if needed.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff, volunteer or contractor should inform the Executive Headteacher about their concern using a Low-Level Record of Concern Form. Staff are also actively encouraged to self-report where they believe their own conduct may have fallen below the Staff Code of Conduct, may have been misinterpreted, or may have placed themselves in a vulnerable position. Self-reporting will be viewed as a demonstration of professional integrity and commitment to safeguarding.

If the Executive Headteacher cannot be contacted, the Chair of Governors should be contacted instead.

3. Keeping Children Safe in Education September 2026

The following is taken from Keeping Children Safe in Education 2026 and identifies what may be considered behaviour relating to a low-level concern.

Low-level concerns

As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early;
- minimise the risk of abuse; and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

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 or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

A single low-level concern may not meet the allegations threshold; however, a pattern of repeated, similar or accumulating concerns may indicate a more serious safeguarding issue and should be reviewed accordingly.

Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that falls below expected professional standards.

Records of low-level concerns should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified and appropriate action taken where necessary.

If the school or college is in any doubt as to whether a concern meets the harm threshold, it should consult with the Local Authority Designated Officer (LADO).

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who 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 he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low Level Concern:

Any adult linked to our school who has behaved in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

5. Storing and use of Low-Level Concerns and follow-up information

Low Level Concern forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies. The Executive Headteacher (or Chair of Governors where appropriate) will review low-level concern records regularly to identify themes, trends or emerging safeguarding risks.

Deliberately malicious or vexatious allegations will be addressed through appropriate disciplinary procedures. However, individuals raising genuine concerns in good faith will be supported and protected.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Executive Headteacher or those aware in the senior leadership team.

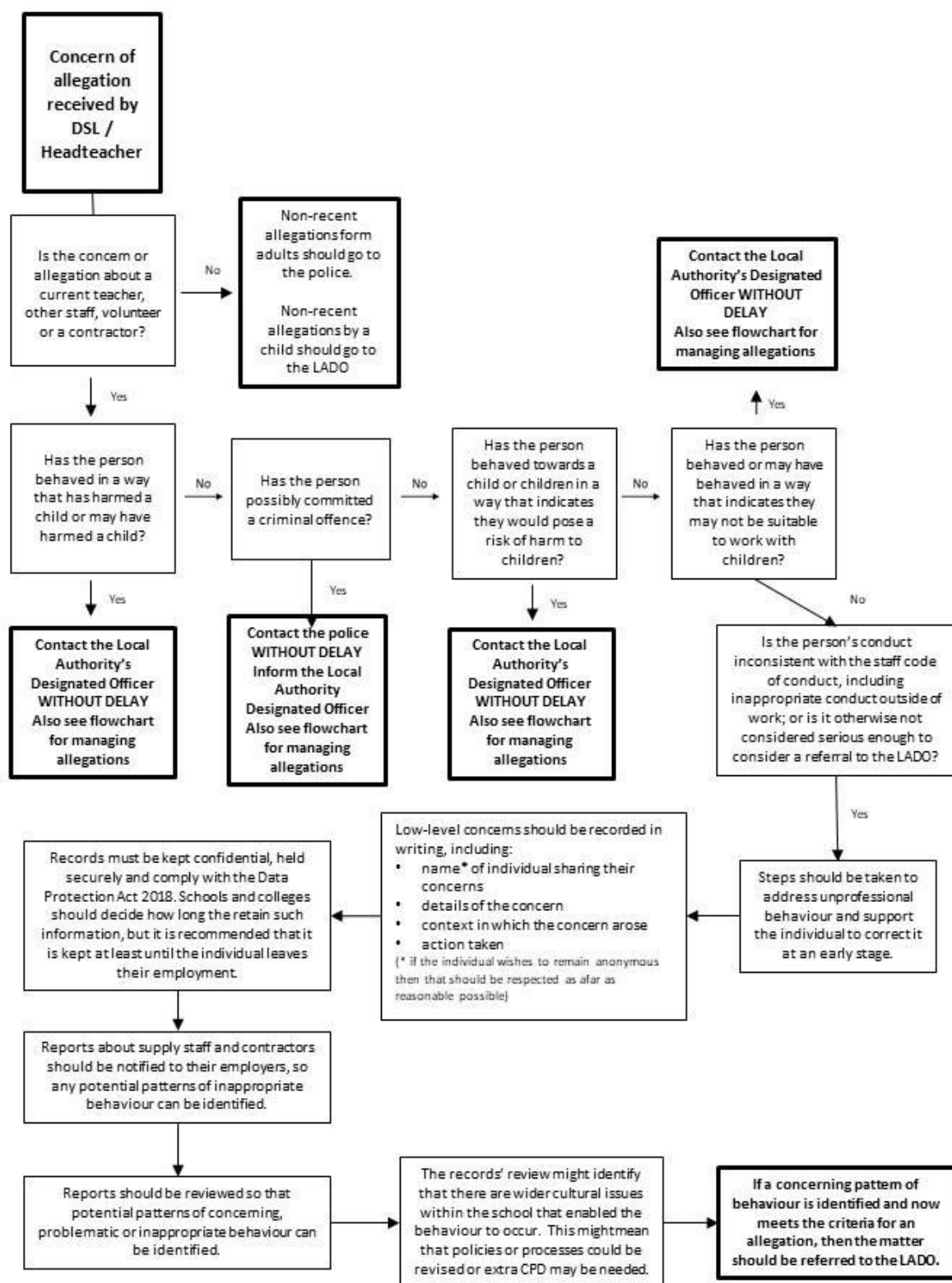
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave schools within the Aspire Federation, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly

***NB – if the concern is about the Executive Headteacher, then the Chair of Governors should be informed. If there is any doubt about whether a concern meets the allegations threshold, advice should be sought from the LADO without delay.**



7. Low-Level Concerns Reporting Form

Please complete the Low Level Concern Form found on our school website 'policy' section.

You will be asked;

- for your name, email address and role (optional)
- the date and time of when the form is being completed
- the name and role of the person you are reporting about
- your relationship to the person you are reporting about
- details of the concern you have, including the names of children or young persons involved
- whether you are willing to meet with the Executive Headteacher and/or DSL to discuss the concerns further
- for any further information