



# **Kenilworth Primary School**

## **Low-Level Concerns Policy**

*'High Aspirations Today, Inspiring the Leaders  
of Tomorrow.'*

**Reviewed October 2025**

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## Introduction

At Kenilworth Primary School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

### 1. 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 should inform the Head Teacher about their concern, if the Head Teacher cannot be contacted, the Assistant Head teachers or Chair of Governors should be contacted.

### 2. Keeping Children Safe in Education September 2025

The following is taken from Keeping Children Safe in Education September 2025

*428. As part of their whole school 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.*

*429. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should: encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate 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.*

#### **What is a low-level concern?**

*430. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338. 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 allegations threshold or is otherwise not considered 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.*

431. *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.*

432. *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.*

433. *It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and 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, allegations or misunderstandings.*

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

### **Allegation**

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- 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.

### **Low-Level Concern**

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

### **Appropriate Conduct**

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

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

LLC forms and follow-up information will be stored securely within the schools 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 staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the 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 Kenilworth Primary School, any record of low-level concerns which are stored about them will be reviewed as to whether that information needs to be kept. Consideration will be given to:

- 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
- If, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

## 6. Process to follow when a Low-Level Concern is raised:

The term low level concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2025) paragraph 430. A low level concern is any concern, no matter how small, and even if no more than causing a sense of unease or 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. This concern may not reach the threshold of the LADO as an isolated incident but could be a pattern of behaviour that does meet threshold. It is important that you document this on the low level concern form and hand it directly to the head teacher.

Low level concerns must be referred to the Headteacher [head@kenilworth.herts.sch.uk](mailto:head@kenilworth.herts.sch.uk). If you are concerned about the Headteacher, please contact the Co-Chairs of Governors on [apatil@kenilworth.herts.sch.uk](mailto:apatil@kenilworth.herts.sch.uk) or [imason@kenilworth.herts.sch.uk](mailto:imason@kenilworth.herts.sch.uk)

## 7. Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2025: <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

## 8. Low Level Concern Form

This form will be available to staff via:

- The office
- DSLs
- The Senior Leadership Team
- The staffroom
- On the school drive in the folder 'low level concerns'

### **Low-Level Record of Concern Regarding a Staff Member:**

Please use the form to share any concern - no matter how small and even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in a manner that:

- is not consistent with the Kenilworth Primary's School's Staff Code of Conduct
- relates to their conduct outside work, which, even if not linked to a particular act or omission, has caused a sense of unease about the adult's suitability to work with children
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO

Where possible please speak with the Headteacher as soon as possible.

It is also helpful to document your concerns, which can be done using this form and then passed onto the Headteacher. You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s). The record should be signed, timed and dated.

When completed pass this form to the Headteacher. If the concern is about the Headteacher, please pass it onto the Co-Chairs of Governors or email them at [apatil@kenilworth.herts.sch.uk](mailto:apatil@kenilworth.herts.sch.uk) and [imason@kenilworth.herts.sch.uk](mailto:imason@kenilworth.herts.sch.uk)

Remember a low-level concern is different to an allegation (which uses a different form).

**Reviewed on September 2026**



## Low Level Concern Form

This form can be used to share any concern with the Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low-level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

### Details of CONCERN:

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Name of staff member:

Department and role:

Signed:

Time and date:

Received by:

At (time):

Date:



## Low Level Concern – Action and Response Form

**WAS THE STAFF MEMBER SPOKEN TO? (Good practice will require a response).**

**NO  - Give a brief but valid reason/explanation for not;**

**YES  - Please complete detail below – STAFF MEMBER’S RESPONSE TO CONCERN:**

**ACTION TAKEN:**

Was advice/guidance sought from the LADO and/or Human Resources? Yes:  No:

**Signed:**

**Dated:**

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School’s Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School’s Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.