# Low-Level Concerns Policy

## Kenilworth Primary School

**Our Vision**

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

**Reviewed:** October 2026
**Next Review Date:** October 2027 *(or in line with changes to KCSIE or if issues arise in practice)*
**Approved by:** Katherine Sampson (Headteacher)

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## 1. Quick Reference Guide

**What is a low-level concern?**
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 our Staff Code of Conduct, but does not meet the threshold for an allegation to the LADO.

**Who do I tell?**
Headteacher: Katherine Sampson – head@kenilworth.herts.sch.uk
If the concern is about the Headteacher, contact: Co-Chairs of Governors: apatil@kenilworth.herts.sch.uk or imason@kenilworth.herts.sch.uk

**What happens next?**
- The Headteacher will speak with you within 2 working days
- The concern will be looked into promptly and sensitively
- The staff member concerned will be spoken to (in most cases)
- You'll receive feedback on the outcome where appropriate
- The concern will be recorded securely

**Where can I get the form?**
- The office
- DSLs
- The Senior Leadership Team
- The staffroom
- On the school drive in the folder 'low level concerns'

**Remember:**
- You can report verbally or in writing
- All concerns are taken seriously
- Reporting in good faith will never result in negative consequences for you
- If in doubt about whether something is a low-level concern or an allegation, speak to the Headteacher immediately

## 2. 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.

Creating a culture in which all concerns about adults working in or on behalf of the school are shared responsibly, recorded and dealt with appropriately is critical to keeping children safe. This policy sets out the detail and processes for staff regarding low-level concerns they may have about any adult working in our school.

## 3. Policy Statement and Aims

### Our Commitment

As part of our whole school approach to safeguarding, we are committed to promoting an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

### What We Aim to Achieve

This policy aims to:

- **Encourage an open and transparent culture** where staff feel confident to raise concerns without fear of negative consequences
- **Enable the school to identify concerning, problematic or inappropriate behaviour early** before it escalates
- **Minimise the risk of abuse** to children in our care
- **Ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries,** and in accordance with the ethos and values of our school
- **Protect staff** from potential false allegations or misunderstandings by ensuring concerns are dealt with fairly and appropriately
- **Comply with statutory guidance** set out in Keeping Children Safe in Education (KCSIE) 2025

### Legal Framework

This policy has been developed in line with:

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023
- The school's safeguarding and child protection duties

## 4. What is a Low-Level Concern?

### Definition

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 for an allegation (see below).
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 of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO)

### Examples of Low-Level Concerns

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.

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 without a valid reason
- Humiliating children
- Using inappropriate language or making inappropriate comments
- Discussing their personal or sexual relationships with or in the presence of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such
- Demonstrating behaviours that are overly familiar or which may be associated with grooming

## Understanding the Difference: Allegation vs Low-Level Concern vs Appropriate Conduct

**Allegation** - Meets the 'harm' threshold and must be referred to the LADO:

- The person has behaved in a way that has harmed a child, or may have harmed a child
- The person has possibly committed a criminal offence against or related to a child
- The person has behaved towards a child in a way that indicates they may pose a risk of harm to children
- The person has behaved in a way that indicates they may not be suitable to work with children

**Low-Level Concern** - Does not meet the harm threshold but is inconsistent with the Staff Code of Conduct:

- Behaviour that causes a sense of unease or nagging doubt
- Behaviour that is inappropriate but does not constitute an allegation
- May be inadvertent, thoughtless, or misinterpreted

**Appropriate Conduct** - Consistent with the Staff Code of Conduct and professional boundaries:

- Professional, boundaried interactions with children
- Behaviour in line with school policies and expectations
- Actions that prioritise children's safety and wellbeing

**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.

## When is it NOT a Low-Level Concern?

**If the behaviour meets any of the criteria for an allegation (listed above), you must report it immediately using the school's allegation procedures, not this low-level concerns process.**

If you are unsure whether something constitutes an allegation or a low-level concern, speak to the Headteacher immediately. It is better to seek advice than to delay reporting.

### How Low-Level Concerns May Arise

Low-level concerns may arise in several ways and from a number of sources, including:

- Suspicion or unease about a colleague's behaviour
- A complaint from a child, parent or other adult within or outside of the school
- A disclosure made by a child, parent or colleague
- Observation of behaviour that seems inconsistent with our Code of Conduct
- As a result of vetting checks undertaken

## 5. How to Report a Low-Level Concern

Who Should I Report To?

All low-level concerns must be reported to the Headteacher:

- **Name:** Katherine Sampson
- **Email:** head@kenilworth.herts.sch.uk
- **In person:** Speak to the Headteacher directly

If the concern is about the Headteacher, report to the Co-Chairs of Governors:

- Email: apatil@kenilworth.herts.sch.uk or imason@kenilworth.herts.sch.uk

### How to Report

You can report a low-level concern in two ways:

### Option 1: Speak to the Headteacher

Where possible, speak with the Headteacher as soon as possible after the incident or when the concern arises. This allows for immediate discussion and clarification.

### Option 2: Complete the Low-Level Concern Form

You can document your concern using the Low-Level Concern Form (see Appendix). The form asks you to provide:

- A concise record of the concern
- Brief context in which the low-level concern arose
- Details which are chronological, and as precise and accurate as possible
- Your signature, time and date
-

Once completed, pass this form directly to the Headteacher (or Co-Chairs of Governors if the concern is about the Headteacher).

### Option 3: Both

You may wish to speak to the Headteacher first and then follow up with a written record using the form. This is often the most effective approach.

### Where to Find the Form

The Low-Level Concern Form is available from:

- The office
- DSLs (Designated Safeguarding Leads)

- The Senior Leadership Team
- The staffroom
- On the school drive in the folder 'low level concerns'
- Appendix to this policy

### Timescales for Reporting

Low-level concerns should be reported **as soon as possible** after the incident or when the concern arises. Do not wait or assume someone else will report it.

Even if you only have a 'nagging doubt' or sense of unease, it is important to share this promptly so it can be considered and addressed if necessary.

### Confidentiality

When you report a low-level concern, you must keep the information confidential and not share the concern with others apart from the Headteacher or those in the senior leadership team who need to be aware.

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 (for example, if a pattern of behaviour emerges that requires escalation, or if advice is sought from the LADO or HR).

### Protection for Those Who Report

Staff who report low-level concerns in good faith will be supported and protected. You will not face any negative consequences for raising a concern, even if it is later found to be mistaken or unsubstantiated, provided you have acted in good faith.

If you feel you have been treated unfairly as a result of raising a low-level concern, you should speak to the Headteacher or, if appropriate, follow the school's whistleblowing or grievance procedures.

## 6. How Low-Level Concerns are Handled

### Initial Response

When a low-level concern is reported, the Headteacher will:

1. **Acknowledge receipt** of the concern within 1 working day
2. **Speak with the person who raised the concern** within 2 working days to gather full details and clarify any points
3. **Review the concern** to determine the appropriate course of action

### Assessment and Investigation

The Headteacher will assess the concern and determine what action, if any, is needed. This may include:

- **Speaking with the staff member concerned** to understand their perspective and provide an opportunity to respond
- **Gathering additional information** from witnesses or other relevant sources
- **Reviewing relevant policies** (e.g., Staff Code of Conduct) to determine whether the behaviour is inconsistent with expectations
- **Seeking advice** from the LADO, HR, or other appropriate professionals if needed
- **Considering whether the concern, when viewed alongside other information, indicates a pattern of behaviour** that requires escalation

### Good Practice in Handling Concerns

In most cases, the Headteacher will speak with the staff member who is the subject of the concern. This conversation will be:

- **Conducted sensitively** and without prejudgement
- **Focused on understanding** what happened and why
- **An opportunity for the staff member** to provide their perspective
- **Used to clarify expectations** and provide guidance or support where needed

However, there may be occasions where speaking to the staff member is not appropriate (for example, if doing so might compromise a potential investigation, or if the concern is very minor and can be addressed through general staff guidance). In such cases, the Headteacher will document the reason for not speaking to the staff member.

### Possible Outcomes

Following the assessment and any investigation, the Headteacher may decide to:

- **Take no further action if** the concern is unfounded or the behaviour was appropriate in the circumstances
- **Provide informal guidance or support** to the staff member to clarify expectations and prevent recurrence
- **Arrange additional training or support** for the staff member
- **Issue a formal reminder** about the Staff Code of Conduct
- **Implement monitoring or supervision** arrangements for a period of time
- **Escalate to formal disciplinary procedures** if the concern, when investigated, is found to be more serious than initially thought
- **Refer to the LADO** if the concern, when investigated, meets the threshold for an allegation

### Timescales

The Headteacher will aim to complete the initial assessment and any necessary follow-up within 10 working days of the concern being raised. If this is not possible (for example, due to staff absence or the complexity of the concern), the person who raised the concern will be informed of the delay and given an expected timescale.

### Feedback to the Person Who Raised the Concern

The person who raised the concern will be informed that the matter has been addressed, but may not be given full details of the outcome due to confidentiality and data protection considerations. However, they will be assured that appropriate action has been taken.

### Support for All Parties

The school recognises that being the subject of a low-level concern can be distressing for staff members. We will:

- Ensure the staff member is treated fairly and given an opportunity to respond
- Provide appropriate support during and after the process
- Make it clear that a low-level concern does not necessarily indicate wrongdoing, and may simply be a misunderstanding or an opportunity for learning
- Ensure that, where the concern is unfounded or the matter is resolved informally, the staff member is able to move forward without stigma

Similarly, the person who raised the concern will be supported and reassured that they have done the right thing in coming forward.

## 7. Recording and Information Management

### How Records are Stored

All low-level concern forms and follow-up information will be:

- **Stored securely** within the school's safeguarding systems
- **Accessible only** to the Headteacher and senior leadership team (on a need-to-know basis)

- **Stored in accordance** with the school's GDPR and data protection policies

Records will be kept in a central, confidential file, separate from staff personnel files.

### Retention of Records

Records of low-level concerns will be retained as follows:

**For Current Staff:**
- Records will be retained for the duration of the staff member's employment at the school
- Records will be reviewed periodically (at least annually) by the Headteacher to identify any patterns of behaviour that may indicate a need for escalation

**When Staff Leave:**
Whenever staff leave Kenilworth Primary School, any record of low-level concerns stored about them will be reviewed to determine whether the 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
- Whether, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly

In most cases, where low-level concerns have been addressed satisfactorily and there is no ongoing pattern of behaviour, records will be deleted when the staff member leaves.
However, if there are concerns that may be relevant to future safeguarding or employment matters, records may be retained in line with the school's safeguarding record retention policy.

### Review of Records for Patterns

The Headteacher will review all low-level concern records on a regular basis (at least termly) to identify any patterns of behaviour, either for individual staff members or across the school. This review will consider:

- Whether multiple low-level concerns have been raised about the same staff member
- Whether the concerns, when viewed together, indicate a pattern that requires escalation
- Whether there are themes or trends across the school that indicate a need for additional training or policy development

If a pattern is identified, the Headteacher will take appropriate action, which may include:

- Escalating to formal disciplinary procedures
- Seeking advice from the LADO or HR
- Implementing additional support, training or supervision for the staff member
- Reviewing school policies or practices

### Use of Records in References

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.

### Access to Records

Staff members have the right to request access to records held about them under data protection legislation. If a staff member requests access to a low-level concern record, the Headteacher will consider the request in line with the school's data protection policy and seek advice from HR or legal advisors if necessary.

## 8. Self-Reporting

### Why Self-Report?

We recognise that staff may sometimes find themselves in situations that could be misinterpreted or that they feel uncomfortable about. We actively encourage staff to self-report such situations.

Self-reporting demonstrates professionalism and a commitment to maintaining appropriate boundaries. It also allows the school to provide support and, if necessary, take steps to prevent misunderstandings.

### When to Self-Report

You should consider self-reporting if:

- You have found yourself in a situation that could be misinterpreted by others
- You have inadvertently breached the Staff Code of Conduct (for example, by being alone with a child in circumstances you had not anticipated)
- You are concerned that your actions, though well-intentioned, may not have been appropriate
- You have received a gift from a child or parent that you are unsure about
- A child or parent has made an approach to you that makes you uncomfortable (for example, via social media)

### How to Self-Report

Self-reporting follows the same process as reporting a concern about someone else:

- Speak to the Headteacher as soon as possible
- Explain what happened and why you are concerned
- You may also complete a Low-Level Concern Form if you wish to provide a written record

### What Happens When You Self-Report?

Self-reporting will **not** automatically lead to disciplinary action. In most cases, the Headteacher will:

- Thank you for coming forward
- Discuss the situation with you
- Provide guidance on how to handle similar situations in future
- Consider whether any additional support or training would be helpful
- Make a brief record of the discussion

Self-reporting demonstrates integrity and will be viewed positively. It allows us to support you and ensure that children remain safe.

## 9. Links to Other Policies

This policy should be read in conjunction with the following school policies:

- **Staff Code of Conduct** - Sets out the expectations for staff behaviour and professional boundaries
- **Safeguarding and Child Protection Policy** - Sets out the school's overall approach to safeguarding, including procedures for allegations that meet the harm threshold
- **Allegations Against Staff Policy** - Sets out the procedures for managing allegations that meet the LADO threshold
- **Whistleblowing Policy** - Sets out how staff can raise concerns about malpractice, wrongdoing or dangers in the workplace
- **Disciplinary and Grievance Procedures** - Sets out the formal processes for managing staff conduct and performance issues
- **Data Protection and GDPR Policy** - Sets out how the school manages personal data, including records of low-level concerns

If you are unsure which policy or procedure applies to your concern, speak to the Headteacher for guidance.

## 10. Training and Support

## Staff Training

All staff will receive training on this policy as part of:

- **Induction** - All new staff (including supply teachers, volunteers and contractors) will be made aware of this policy and how to report low-level concerns
- **Annual safeguarding training** - This policy will be covered as part of the school's annual safeguarding update for all staff
- **Ongoing reminders -** The Headteacher will provide regular reminders about the importance of reporting low-level concerns, for example in staff meetings or briefings

## Creating a Positive Culture

The effectiveness of this policy depends on creating a culture where:

- Staff feel confident to raise concerns without fear of negative consequences
- Concerns are taken seriously and dealt with promptly and fairly
- Staff understand that raising concerns is part of their professional responsibility to keep children safe
- Staff are clear about professional boundaries and expectations

The Headteacher and senior leadership team are committed to fostering this culture through:

- Leading by example
- Responding positively when concerns are raised
- Providing regular communication and training
- Ensuring that staff who raise concerns are supported and protected

## Support for Staff

If you have any questions about this policy, or if you are unsure whether something constitutes a low-level concern, please speak to:

- The Headteacher
- A member of the senior leadership team
- A Designated Safeguarding Lead (DSL)

You can also refer to the following resources for further information:

- Keeping Children Safe in Education 2025 (available on GOV.UK)
- Guidance on Low-Level Concerns from Farrer & Co: https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf

# 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.

Please provide a concise record, 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, timed and dated.

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

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

## SECTION A: Details of Person Reporting the Concern

| | |
|---|---|
| **Your name:** | |
| **Your role/position:** | |
| **Date and time of completing this form:** | |

## SECTION B: Details of the Concern

| | |
|---|---|
| **Name of staff member the concern relates to:** | |
| **Their role/position:** | |
| **Date and time of incident/behaviour (if known):** | |
| **Location of incident/behaviour (if known):** | |

## SECTION C: Details of Concern

**Please provide as much detail as possible about what you observed, heard or were told. Include:**

- What happened?
- When did it happen?
- Where did it happen?
- Who was involved (including any children or witnesses)?
- Why are you concerned about this behaviour?
- Any other relevant information.

**Continue on a separate sheet if necessary.**

| |
|---|
| |

**SECTION D: Your Signature**

| | | | |
|---|---|---|---|
| **Signed:** | | **Date and time:** | |

**SECTION E: Receipt of Concern (to be completed by Headteacher)**

| | |
|---|---|
| **Received by:** | |
| **Date and time received:** | |
| **How was the concern received?** | ☐ In person ☐ By email ☐ By phone ☐ Written form |

# Low Level Concern – Action and Response Form

**To be completed by the Headteacher**

## Initial Assessment

| | |
|---|---|
| **Date concern reviewed:** | |
| **Was additional information gathered?** | ☐ Yes ☐ No |
| **If yes, please provide details:** | |

## Was the staff member spoken to?

| | |
|---|---|
| ☐ **YES – Please completed details below** | ☐ **NO – Please provide a brief but valid reason/explanation:** |

| |
|---|
| **Staff Member's Response (if applicable):** |
| **Action Taken**<br><br>**Please provide details of any action taken, including:**<br>• Outcome of discussions with the staff member<br>• Any guidance, support or training provided<br>• Any monitoring or follow-up arrangements<br>• Whether the matter has been escalated |

## Advice Sought

| | |
|---|---|
| Was advice/guidance sought from the LADO? | Yes: ☐ No: ☐ |
| Was advice/guidance sought from Human Resources? | Yes: ☐ No: ☐ |
| Was advice/guidance sought from anyone else? | Yes: ☐ No: ☐ |
| If yes, please provide details: | |

**Outcome and Next Steps**

| | |
|---|---|
| Summary of outcome: | |
| Does this concern indicate a pattern of behaviour? | Yes: ☐ No: ☐ Unsure: ☐ |
| If yes, what action has been taken? | |
| Has the person who raised the concern been informed of the outcome? | Yes: ☐ No: ☐ |
| Date feedback provided: | |

**Record Keeping**

| | |
|---|---|
| Where will this record be stored? | |
| Who has access to this record? | |
| Date for review of this record: | |

**Signature**

| Completed by (Headteacher): | Signed: | Date: |
|---|---|---|
| | | |

**This record will be held securely in accordance with the School's GDPR and data protection 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.**