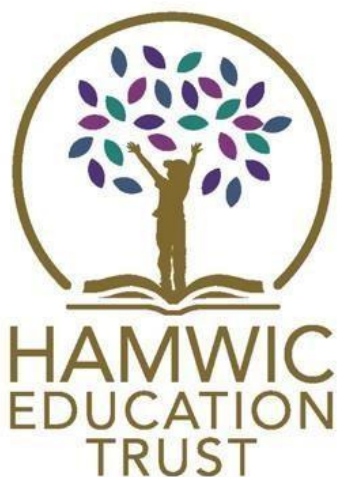




Low Level Concerns Policy

Prepared By:

L Houghton

Approved By:

FGB

Date: September 2023

Start Date:

September 2026

Review

Date:

September 2027



Introduction

At Sholing Infant School, we take our safeguarding responsibilities seriously and recognise that safeguarding is everyone's responsibility. 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 Handbook.

This policy sets out the detail and processes for staff regarding low-level concerns they may have.

Summary

The term 'low-level' concern does not mean that a concern is insignificant. 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 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 overfriendly 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.

Keeping Children Safe in Education September 2026

The following is taken from Keeping Children Safe in Education September 2026

'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.'

At Sholing Infant School, any low-level concerns should be shared with the Headteacher/DSL or in her absence the Deputy Headteacher/DDSL.

Any low-level concerns regarding the Headteacher should be reported to the Chair of Governors or the safeguarding lead at HAMWIC trust, Julie Prince.

As good practice governing bodies and proprietors should set out their low-level concerns policy within their staff code of conduct and safeguarding and child protection policies as set out in Part two of this guidance. This policy should be read in conjunction with the safeguarding policy as well as the HAMWIC trust staff handbook. This will ensure that all staff understand what a low-level concern is and the importance of sharing low-level concerns. This will ensure that there is a culture of openness, trust and transparency in which the school values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff by:



- ensuring that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others,
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage,
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or colleges safeguarding system.

If the Headteacher/DSL has any doubts as to whether the information which has been shared about a member of staff as a low-level concern meets the harm threshold, she will consult with the LADO - Gemma Swann.

Sholing Infant School is an environment in which staff are encouraged and feel confident to self-refer, where, for example, 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 such a way that they consider falls below the expected professional standards.

Recording low level concerns:

All low-level concerns should be recorded in writing using the HAMWIC online reporting tool, after the member of staff raising the concern has spoken to the Headteacher/DSL. A record of the low-level concern will then be added to Bromcom records for the member of staff about whom the concern was recorded.

The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

Records of low-level concerns are regularly reviewed so that potential patterns of inappropriate or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO

Records of any low-level concerns are retained at least until the individual leaves their employment. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding would not be referred to in a reference.

What happens after a low-level concern has been raised?

If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

The information collected will help the Headteacher to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action.



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.



Managing Low Level concerns in relation to all staff in Schools & other educational settings, including teachers, supply staff, other staff, volunteers, & contractors; in accordance with your schools Code of Conduct for staff.

