



Saint Jérôme
Church of England
Bilingual School

Low-Level Concerns Policy

Policy created:	September 2026: did not previously exist as a standalone document
Date of next review:	September 2027
Review cycle:	Annually, alongside our Child Protection and Safeguarding Policy, and sooner if KCSIE changes.
Linked policies:	Child Protection and Safeguarding Policy, Staff Code of Conduct, Safer Recruitment and Selection Policy, Whistle-Blowing Policy.

Version history

Date	Version	Summary of changes
September 2026	V1	New policy, written from scratch, since no low-level concerns procedure previously existed at Saint Jérôme, despite being cross-referenced from both the Child Protection and Safeguarding Policy and the Staff Code of Conduct. Grounded directly in KCSIE 2026's dedicated content on concerns that do not meet the harm threshold.

Headteacher:

Kate Schutte

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(Kate Schutte)

Co-Chairs of Governors: Approved by Governors on 17th September 2026

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(Vas Lappas and Edward Stowell)

1. Introduction

Saint Jérôme Church of England Bilingual School is committed to a culture of openness, trust and transparency, in which all concerns about adults working in or on behalf of the school, whether serious or not, are shared responsibly, with the right person, recorded, and dealt with appropriately.

This policy sits alongside our Child Protection and Safeguarding Policy and our Staff Code of Conduct. It applies to all staff, supply staff, trainee teachers, volunteers, contractors and governors.

This policy is grounded in Keeping Children Safe in Education (KCSIE) 2026, which sets out how schools should respond to concerns or allegations about adults that do not meet the harm threshold for a referral to the Local Authority Designated Officer (LADO). These are commonly known as low-level concerns.

2. What Is a Low-Level Concern?

A low-level concern is any concern 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, including behaviour outside work, but does not meet the harm threshold, or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns can be raised in several ways, and from differing sources: a suspicion, a complaint or disclosure by a child, a parent or another adult, something noticed by a colleague, or something identified through vetting or reference checks.

Examples of behaviour that might raise a low-level concern include, but are not limited to:

- Being overly physical with a child, beyond what is appropriate for their age or the activity
- Having favourites, or spending an excessive amount of one-to-one time with a particular child without a clear reason
- Making or allowing inappropriate comments about, or to, a child
- Humour or language, including in written communication, that a reasonable person could consider inappropriate
- Contacting a child directly through personal mobile phones, email or social media, or giving a child their personal contact details, other than in line with agreed school arrangements
- Failing to maintain appropriate professional boundaries with a child, parent or colleague
- Behaving in a way in their personal life that raises a safeguarding concern, whether or not it directly relates to a child, for example an adult in the household becoming subject to child protection procedures.

This is not an exhaustive list. If in doubt, staff should always raise the concern rather than decide for themselves that it does not matter; a pattern that only becomes visible when several small concerns are seen together is exactly what this policy is designed to catch.

3. Roles and Responsibilities

3.1 The Governing Body

The Governing Body is responsible for ensuring this policy is in place and complied with, for ensuring the Designated Safeguarding Lead (DSL) has the time and authority to fulfil this role, and for receiving regular, anonymised information on the volume and nature of low-level concerns raised, so that any wider patterns can be identified and addressed.

3.2 The Designated Safeguarding Lead

Sarah Cox, as DSL, is the usual point of contact for a low-level concern. The DSL is responsible for: acting as a point of contact for staff raising a concern; assessing whether a concern meets the threshold for an allegation, in which case our Child Protection and Safeguarding Policy applies instead; recording concerns appropriately and confidentially; identifying patterns across multiple, individually minor concerns; and deciding, in consultation with the Headteacher, what action, if any, is needed.

3.3 The Headteacher

Where a low-level concern is about a member of staff, the Headteacher is normally informed and involved in deciding what action is needed. Where a low-level concern is about the Headteacher, it should be raised directly with the Co-Chairs of Governors, rather than with the DSL.

3.4 The Named Safeguarding Governor

Cath Still, as Named Safeguarding Governor, provides oversight of how this policy is working in practice, and receives anonymised information about the volume and nature of concerns raised, in line with section 3.1 above.

3.5 All Staff

All staff have a duty to raise a low-level concern about a colleague's behaviour, however minor it may seem, rather than assume someone else will, or that it is not significant enough to mention.

4. Raising a Low-Level Concern

A low-level concern can be shared verbally, in the first instance, with the DSL, or by email. Where a concern relates to a specific incident, it should be shared as soon as reasonably possible, ideally within 24 hours of becoming aware of it. It is never too late to raise a low-level concern, and a delay should never be treated as a reason not to.

Staff do not need to be certain that something is wrong before raising a concern. It is the role of the DSL, not the member of staff raising it, to decide what happens next.

5. Recording and Reviewing Concerns

All low-level concerns are recorded on CPOMS, in the same way as other safeguarding information, in line with our Child Protection and Safeguarding Policy and Data Protection Policy. Records are kept confidential, with access limited to those who need it, for example the DSL, Headteacher, and, where a concern relates to the Headteacher, the Co-Chairs of Governors.

The DSL reviews recorded low-level concerns regularly, so that patterns of behaviour by an individual, or wider patterns across the school, can be identified. This may include concerns that, individually, would not have warranted any action, but which together suggest something that does need to be addressed.

6. What Happens Next

Having considered a low-level concern, the DSL and Headteacher may decide that: no further action is needed, but the concern is recorded in case a pattern emerges later; an informal conversation with the individual concerned is appropriate, to address the behaviour directly; the matter should be addressed through our usual management or supervision arrangements; or, if a pattern of low-level concerns, or a single concern on reflection, is considered serious enough, the matter should instead be handled as an allegation under our Child Protection and Safeguarding Policy, including a referral to the LADO where appropriate.

Where a pattern of low-level concerns suggests a wider disciplinary issue, this may be addressed under the school's usual disciplinary procedures, run alongside, rather than instead of, our safeguarding response.

7. Supporting the Individual Concerned

Raising a low-level concern is not the same as making an allegation, and should not be treated as such. Where appropriate, the individual the concern relates to is made aware of it and given the opportunity to respond, unless doing so would compromise a wider safeguarding process. The school recognises that most low-level concerns have an innocent or easily-addressed explanation, and aims to handle every concern proportionately, fairly, and without assuming the worst.

8. Confidentiality

Information about a low-level concern is shared only with those who need to know it, in line with our Data Protection Policy. This does not prevent the DSL and Headteacher discussing a concern with each other, or with the Co-Chairs of Governors where necessary, in order to fulfil the responsibilities set out in this policy.