

Federation of St Charles and St Mary's Catholic Primary Schools



Low-Level Concerns Policy

Date policy reviewed by the Governing Body: Autumn 2026
Date policy to be reviewed: Autumn 2028

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Low-Level Concerns Policy

1. Introduction

At St Mary's Catholic 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.

2. Summary

A low-level concern is any concern, no matter how small, and even if it is no more than 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, but does not meet the harm threshold or is otherwise not serious enough to warrant a referral to the LADO. All concerns about adults working in or on behalf of the school, including supply staff, trainee teachers, volunteers and contractors, must be shared responsibly, recorded and dealt with promptly and appropriately. Staff may raise a concern about another adult or self-report a concern about their own conduct. Concerns should normally be reported to the Head of School/Executive Head Teacher or DSL in accordance with the reporting arrangements below. If the concern relates to the Head of School/Executive Head Teacher, it must be reported to the Chair of Governors (or the Federation's nominated person).

3. What 'Keeping Children Safe in Education' says about Low-Level Concerns

The following principles reflect Keeping Children Safe in Education (KCSIE) 2026, Part Four and Section Two: Concerns or allegations that do not meet the harm threshold – referred to as low-level concerns.

424. 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.

425. 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.

What is a low level concern?

426. The term 'low-level' concern does not mean that it 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 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,*
- *humiliating children.*

427. 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.

428. 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.

429. 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.

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

Where there is uncertainty: If the school is in any doubt about whether information shared as a low-level concern meets the harm threshold, the Head of School/Executive Head Teacher should consult the LADO. The school should not attempt to resolve a potentially threshold concern as a low-level concern.

Appropriate conduct: Behaviour that is consistent with the Staff Code of Conduct, safeguarding procedures and professional expectations.

Concern/allegation meeting the harm threshold: Where an allegation indicates that an adult working in or on behalf of the school has behaved in a way that has harmed a child, may have harmed a child, may have committed a criminal offence against or related to a child, or has behaved towards a child/children in a way that indicates they may pose a risk of harm. The school's allegations procedure and local authority procedures must then be followed.

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 the Staff Code of Conduct but does not meet the harm threshold and is not otherwise serious enough to warrant referral to the LADO.

A concern may be a low-level concern, a concern/allegation that meets the harm threshold, or conduct that is appropriate and consistent with the school's expectations. The distinction must be considered carefully and proportionately.

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

All low-level concern records and follow-up information will be stored securely within the school's safeguarding system, with access restricted to those who need the information for safeguarding and employment purposes. Records will be handled in accordance with the school's Data Protection and GDPR arrangements. The record should contain sufficient detail to allow the school to understand what the concern was, the context in which it arose, what action was taken, decisions made, the rationale for those decisions and the outcome.

Information about a low-level concern must be shared confidentially and only with those who need to know in order to consider, respond to and record the concern. The person raising the concern should not discuss the

matter more widely. The school will handle information sensitively and proportionately, while ensuring that safeguarding and employment responsibilities are met.

Low-level concerns will not automatically be included in employment references. However, the school will consider whether information about low-level concerns is relevant and should be disclosed in a reference where this is lawful, appropriate and supported by the circumstances and the school's employment/reference processes. A low-level concern should not be treated as a disciplinary finding simply because it has been recorded.

When a member of staff leaves the school, records of low-level concerns will be reviewed in accordance with the school's safeguarding and data-retention arrangements. The school will consider whether the information should be retained for safeguarding, employment or potential historic employment/abuse claims, and will securely delete information when there is no lawful or continuing reason to retain it.

5d. Self-reporting

Staff are encouraged to self-report where they recognise that their own behaviour may have fallen below the standards expected in the Staff Code of Conduct or could be perceived as inappropriate. Self-reporting will be considered fairly and proportionately and does not in itself imply wrongdoing.

5c. Pattern review and escalation

The Head of School/Executive Head Teacher, with the DSL as appropriate, will periodically review low-level concern records to identify patterns or emerging themes relating to an individual, team, practice or wider safeguarding culture. A pattern of behaviour may require further action, including management advice, professional support, disciplinary action or consideration under the harm-threshold procedure. Where information may meet the harm threshold, the LADO will be consulted.

5b. Supply staff and contractors

Where a low-level concern relates to a member of supply staff or a contractor, the school will notify the person's employer where appropriate so that any potential pattern of inappropriate behaviour can be identified and addressed.

5a. Creating an open and transparent culture

The school will promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are taken seriously. Staff will be clear about professional boundaries and expected conduct and will be encouraged to raise concerns promptly. The purpose of the low-level concerns process is to identify inappropriate or problematic behaviour early, address unprofessional behaviour, protect children and support staff from misunderstandings or false concerns.

6. Key Reference Documents

For more information on Low Level Concerns, use the links below.

NSPCC advice

<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education#:~:text=Schools%20should%20have%20a%20low,conduct%20for%20staff%20and%20volunteers>

7. Process to follow when a Low-Level Concern is raised

DRAFT

Concern or allegation received by Headteacher

For more detailed information, refer to Keeping Children Safe in Education (2021) Part Four

Is the concern or allegation about a current teacher, supply teacher, other staff, volunteer or a contractor?

No

Non-recent allegations from adults should go to the police.

Non-recent allegations by a child should go to the LADO

Contact the Local Authority's Designated Officer 'without delay'. See also flowchart for managing allegations.

Yes

Has the person behaved in a way that has harmed a child or may have harmed a child?

No

Has the person possibly committed a criminal offence?

No

Has the person behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children?

No

Has the person behaved or may have behaved in a way that indicates they may not be suitable to work with children?

No

Steps should be taken to address unprofessional behaviour and support the individual to correct it at an early stage.

Yes

Is the person's conduct inconsistent with the staff code of conduct, including inappropriate conduct outside of work; or is it otherwise not considered serious enough to consider a referral to the LADO.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra CPD may be needed.

What is a low level concern?

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 (2021) 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.

Step 7 – Supply staff and contractors

Where appropriate, the person's employer will be informed when the concern relates to supply staff or contractors so that patterns can be identified and managed.

Step 6 – Review for patterns

Low-level concern records will be reviewed periodically to identify patterns or emerging themes. Where a pattern indicates increasing concern or a weakness in safeguarding practice, appropriate action will be taken and the matter escalated where necessary.

Step 5 – Record and action

The concern, actions taken, decisions, rationale and outcome will be recorded securely. The response will be sensitive and proportionate and may include a confidential discussion, professional advice, training, supervision, management action or other appropriate action.

Step 4 – LADO consultation where required

If there is any doubt about whether the concern meets the harm threshold, the LADO will be consulted. If the threshold is met, the school's safeguarding allegations procedure and local authority procedures will be followed instead of treating the matter solely as a low-level concern.

Step 3 – Initial consideration

The Head of School/Executive Head Teacher, with the DSL as appropriate, will consider the information, the context and whether the matter is consistent with the Staff Code of Conduct. They will determine whether it is appropriate conduct, a low-level concern, or potentially meets the harm threshold.

Step 2 – Concerns about the Head of School/Executive Head Teacher

If the concern relates to the Head of School/Executive Head Teacher, it must be reported to the Chair of Governors (or the Federation's nominated person) and must not be dealt with by the person who is the subject of the concern.

Step 1 – Share the concern promptly

Staff should report a low-level concern as soon as reasonably practicable using the Low-Level Concern Reporting Form, or by speaking directly to the Head of School/Executive Head Teacher or DSL. Concerns must not be delayed because they appear minor.

8. Low Level Concern Form



Low Level Concern Reporting Form

Your details	
Name	
Role	
Date and Time of completing this form	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	

Role		
Relationship to the person reporting e.g. Manager, colleague		
Details of concern		
Please, include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?		
Details of any children or young people involved		
Name(s)		
Next steps		
Are you willing to meet with the Headteacher and DSL to discuss your concern? Please, circle the appropriate	Yes	No
Please state any other information that you feel is relevant to the processing of this concern		
Signature:		

9. Low Level Concern Follow-up Form



Low Level Concern Follow-up Form

For us by Headteacher/Safeguarding Team upon receipt of concern	
Date and time concern was received	

Signature	
Role	
Actions to be taken and follow-up	

Please record the action taken, outcome, whether any follow-up is required, and whether the record should be considered as part of a future pattern review.

Outcome and review

Please record whether the information is considered appropriate conduct, a low-level concern, or whether it may meet the harm threshold. Record the reasons for the decision and any LADO consultation.

Decision and rationale