



## Low-Level Concerns Policy

Last updated: September 2025	Next review: September 2026
Ratified by: Proprietor – Susi Earnshaw	Reviewer: DSL Katherine Tyler

### 1. Purpose

The purpose of this Low-Level Concerns Policy is to create and maintain a culture of openness, transparency, vigilance and trust in which all concerns about adults working in or on behalf of the school are shared responsibly and dealt with promptly, proportionately and appropriately.

The school aims to foster a culture of vigilance, professional curiosity and shared responsibility in safeguarding children.

This policy forms part of the school's wider safeguarding and child protection procedures and should be read alongside:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Disciplinary Procedures
- *Keeping Children Safe in Education 2025 (KCSIE)*

The school recognises that creating a culture in which concerns are identified early, shared openly and managed appropriately helps to safeguard pupils and protects adults from misunderstanding or false allegations.

All low-level concerns will be recorded, reviewed and retained to enable identification of patterns of behaviour over time.

## 2. Scope

This policy applies to all adults working in or on behalf of the school, including:

- Teaching staff
- Support staff
- Volunteers
- Proprietors
- Contractors
- Freelance teachers/choreographers
- Licensed chaperones
- Work placement students
- Theatre technicians
- Supply staff
- Agency staff

## 3. Definition of a Low-Level Concern

A low-level concern is any concern, no matter how small, which causes 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 Behaviour and Code of Conduct;
- does not meet expected professional standards; or
- may not be considered serious enough to meet the harm threshold for referral to the Local Authority Designated Officer (LADO), but still requires reporting and consideration.

Low-level concerns may include behaviour which:

- appears over-familiar with pupils;
- involves inconsistent professional boundaries;
- includes inappropriate comments, jokes or language;
- involves favouritism;
- involves unnecessary one-to-one situations;
- involves communication with pupils through personal devices or social media;
- involves inappropriate online conduct, messaging, digital communication or social media activity which may compromise professional boundaries;
- involves photographing pupils on personal devices;
- creates discomfort or uncertainty, even where there is no immediate safeguarding risk identified.

Low-level concerns may arise from conduct within or outside the workplace where such behaviour may impact suitability to work with children.

The school recognises that a pattern of seemingly minor concerns may together indicate a more serious issue. Staff should exercise professional curiosity and not assume that a concern is insignificant simply because it appears minor in isolation.

Allegations that meet the harm threshold are those where an adult working in or on behalf of the school 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Such concerns will be managed in accordance with Part Four of KCSIE 2025 and referred to the LADO where appropriate.

#### **4. Reporting Low-Level Concerns**

All staff are encouraged to report any low-level concern promptly to the Headteacher or Designated Safeguarding Lead (DSL).

Where the concern relates to the DSL, it should be reported directly to the Headteacher.

Where the concern relates to the Headteacher, it should be reported to the Proprietor.

The school encourages a culture where concerns are shared openly and without fear of criticism or reprisal.

#### **5. Self-Referral**

Staff are encouraged to self-refer where they:

- believe they may have acted in a way which could be misinterpreted;
- find themselves in a situation which may appear compromising to others; or
- reflect on behaviour which may fall below expected professional standards.

Self-reporting helps ensure that concerns are addressed early, fairly and transparently.

#### **6. Recording Low-Level Concerns**

All low-level concerns will be recorded in writing.

Records will be factual, accurate, objective and non-judgmental.

The written record will include:

- a clear and comprehensive summary of the concern;
- the date, time and context of the incident;
- details of all individuals involved;
- any witnesses;
- actions taken;
- decisions reached and rationale for those decisions;
- whether the concern has been shared with external agencies;
- follow-up actions and outcomes.

Where concerns are initially reported verbally, a written record of the discussion will be made.

The name of the person reporting the concern will usually be recorded. Requests for anonymity will be respected as far as reasonably possible, although complete anonymity cannot always be guaranteed where disciplinary or criminal processes apply.

## **7. Responding to Low-Level Concerns**

The Headteacher, or delegated DSL, will respond to concerns promptly, fairly and proportionately.

This may include:

- speaking to the person reporting the concern;
- gathering information from witnesses;
- speaking to the individual involved;
- reviewing relevant evidence;
- considering whether there are wider safeguarding or cultural concerns.

The school will determine whether:

- the behaviour is consistent with the Staff Behaviour and Code of Conduct and no further action is required;
- the matter constitutes a low-level concern requiring guidance, support, supervision or additional training;
- the matter should be managed through disciplinary procedures; or
- the concern meets the threshold for referral to the LADO or other external agencies.

Where advised by the LADO or police, the individual concerned may not be informed immediately.

The school will avoid assumptions or prejudicial decision-making and will ensure all concerns are managed sensitively and proportionately.

## **8. Referral to the LADO**

Where a concern meets the harm threshold, or where a pattern of concerns indicates potential risk, the matter will be referred to the Local Authority Designated Officer (LADO).

The school will follow local safeguarding partnership procedures and statutory guidance.

## **9. Monitoring and Reviewing Concerns**

Records of low-level concerns will be reviewed regularly to identify:

- patterns of concerning behaviour;
- repeated boundary issues;
- cultural concerns within the school;
- training or supervision needs.

Where patterns are identified, appropriate action will be taken, which may include:

- additional supervision;
- professional guidance;
- formal disciplinary procedures;
- referral to the LADO or police.

The school will also consider whether policies, systems or staff training require review to minimise the risk of recurrence.

## **10. Record Storage and Confidentiality**

Low-level concern records will:

- be kept confidential;
- be stored securely;
- be held separately from routine personnel records where appropriate;
- be managed in accordance with safeguarding and data protection requirements.

The Headteacher and/or DSL will maintain oversight of all low-level concern records.

Records will normally be retained at least until the individual leaves employment in accordance with statutory guidance and the school's data retention schedule.

Low-level concerns will not be included in references unless:

- they relate to substantiated safeguarding concerns;
- they meet the threshold for referral to the LADO and are found to be substantiated; or
- they would normally be included due to misconduct or disciplinary findings.

## **11. Support for Staff**

The school recognises that low-level concerns can be stressful for all parties involved.

Staff will be treated fairly, respectfully and with professionalism throughout the process. Appropriate support and guidance will be offered where required.

## **12. Training**

All staff will receive:

- safeguarding training;
- guidance on professional boundaries;
- information regarding low-level concerns procedures;
- regular reminders of the Staff Behaviour and Code of Conduct.

Training will reinforce the importance of maintaining professional boundaries, exercising professional curiosity and reporting concerns promptly.

This policy will be reviewed annually or earlier if statutory guidance changes.

## **13. Monitoring and Review of Policy**

The Proprietor will review the effectiveness of this policy regularly, including reviewing anonymised low-level concerns data where appropriate, to ensure concerns are managed consistently, fairly and effectively.

The school will also review whether safeguarding culture, systems, training and procedures remain effective in minimising risk and promoting pupil welfare.