William Austin Junior School
Policy for Low-Level Concerns

Adoption of LBC policy

Low-Level Concerns Policy

1.0 Introduction

1.1 This policy outlines the school approach to managing concerns about adults which do not meet the allegation threshold nor are considered serious enough to make a referral to LADO.

1.2 For the purpose of this policy, the term 'employee' will refer to any adult associated with the school/trust, i.e. whether working for or with the school, engaged as a paid employee, self-employed contractor, volunteer, agency staff, governor or trustee.

1.3 This policy should be read in conjunction with the school's Code of Conduct and Disciplinary Procedure.

2.0 Purpose and aims

2.1 The purpose and aims of this policy are to:

- create and embed a culture of openness and transparency throughout the school
- ensure that people feel empowered to share any low-level safeguarding concerns or problematic or inappropriate behaviour so that it can be identified, reported, recorded and dealt with appropriately to minimise the risk of abuse
- ensure that all employees are clear about professional boundaries and act within them at all times
- address unprofessional behaviour and support employees to correct their behaviour at an early stage
- provide a responsive, sensitive and proportionate way to handle such concerns when they are raised
- identify any weakness in the school safeguarding procedures

3.0 Definition – what is classed as a 'low level concern?'

3.1 The term 'low-level' concern does not mean that the concern is insignificant but means that the behaviour towards the child does not meet the 'harms threshold' as defined in Keeping Children Safe in Education.

3.2 A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an employee may have acted in a manner which:

- is not consistent with the school 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 person's suitability to work with children.

3.3 Examples of such behaviour may include, but are not limited to:

- being over-friendly with children
- having favourites
- engaging with a child on a one to one basis in a secluded area or behind a closed door
- using 'nicknames' for children

3.4 Staff, themselves, do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Headteacher.

4.0 Sharing and Recording Low-Level Concerns

4.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. All concerns, no matter how small, must be reported.

4.2 Low-level concerns about a member of staff should be reported **immediately** to the Headteacher.

4.3 Where a low-level concern relates to the Headteacher, this should be reported to the Chair of Governors.

4.4 In the event of concerns about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs).

4.5 Where a low-level concern relates to supply staff or a contractor working within the school, that concern should be shared with the Headteacher. This should be recorded in accordance with this policy. Their employer, for example the agency, should also be notified so that any potential patterns of inappropriate behaviour can be identified.

4.6 All low-level concerns should be recorded in writing. A template 'low-level concern reporting form' which can be found at appendix 1 of this policy.

4.7 A record of the concern should be kept in a central 'low level concerns file' (which can be an electronic or paper file). An example of a 'low level concerns file' can be found in the Farrer guidance document. The record should be kept in a secure manner. The concern records will be kept in a chronological order as a running record. Each entry will have the time and date recorded, along with the name of the individual who has made the record and the outcome of the concern. Schools should ensure the records are stored securely and confidentially in line with the Data Protection Act 2018 and the UK GDPR. The records should be retained at least until the employee ceases employment.

4.8 Records should be reviewed periodically to ensure that all such concerns are being dealt with promptly and appropriately, and so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school/trust should seek advice from the Local Authority Designated Officer (LADO) as to whether the pattern of concerns meet the harms threshold and whether the matter should be dealt with under the school's disciplinary process. A record of reviews should be made. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

4.9 If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO, the records relating to the low-level concern will be placed on the individual's personnel file.

4.10 If a low-level concern (or group of concerns) is re-classified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the individual's personnel file.

4.11 Where, following consideration of a reported concern, it is determined that the individual's behaviour was consistent with the code of conduct and does not constitute a low-level concern, the outcome and rationale for that decision will be recorded. Such a matter will not be treated as an established low-level concern and will not be considered when considering any future concerns or identifying patterns of behaviour.

5.0 Self-Reporting

5.1 Occasionally an individual might find themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, an individual may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. In these instances, an individual may wish to self-report and this is encouraged. This can be positive for a number of reasons:

- it enables a potentially difficult issue to be addressed at the earliest opportunity;
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and
- it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour

6.0 Responding to low-level concerns

6.1 After being informed of the concern, the Headteacher will be required to collect as much evidence as possible by speaking to the person who raised the concern, the individual involved (unless advised not to do so by the LADO where they have been contacted) and, where appropriate, any witnesses.

6.2 The information collected will be reviewed to determine whether the behaviour:

- is in fact consistent with the schools Code of Conduct and the law;
- constitutes a low-level concern or is serious enough to consider a referral to the LADO; or
- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO

6.3 The Headteacher will categorise the type of behaviour and determine what further action is appropriate. This information needs to be recorded along with the rationale for their decision and the action taken.

6.4 Where necessary, the Headteacher will seek the advice of the LADO (maintaining the anonymity of the individual at this point where possible).

7.0 Outcomes

7.1 The behaviour is consistent with the school Code of Conduct

If the Headteacher determines that the behaviour is consistent with the schools Code of Conduct, then they should inform the individual to whom the concern relates what was shared about their behaviour so that they have an opportunity to respond. The individual in question will be informed that their behaviour is consistent with the schools Code of Conduct.

7.2 The Headteacher will also speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Code of Conduct and the law. It is important that the person who shared the concern understands that whilst the employee's behaviour is consistent with the Code of Conduct, they were right to raise the concern.

7.3 The current concern is a low-level concern

If the Headteacher determines that the concern is a low-level concern, the individual in question will be informed of what information was shared about their behaviour so that they have an opportunity to respond.

7.4 The Headteacher will determine the most suitable response and may wish to seek HR advice. The response may include:

- a constructive conversation with the individual about their behaviour and why it was deemed to be a concerning, problematic or inappropriate, what change is required in their behaviour, and what, if any, support may be provided

- training and/or guidance
- mentoring from an appropriate individual, e.g. a line manager
- any support as identified by the individual themselves

7.5 The concern is serious enough to warrant a referral to the LADO

If the Headteacher determines that the concern is sufficiently serious, or when considered with any other low-level concerns that have been shared about the same individual, the concern should be reclassified as an allegation. The Headteacher must make a referral to the LADO

7.6 In the event that the concern is referred to the LADO or reclassified as an allegation, the school procedure for dealing with allegations of abuse against teachers and other staff will be followed and upon LADO advice, disciplinary action may be instigated.

8.0 References

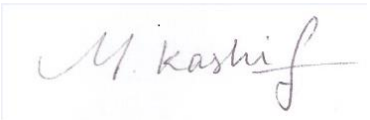
8.1 Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated after an investigation, it should be referred to in a reference. Further information can be found in the school Reference Policy.

This policy will be monitored and reviewed by the Governing Body on an annual basis.

Policy updated: September 2026

Staff responsible: Headteacher

This policy was ratified by the Governing body on: 16th September 2026



Signed on behalf of the Governing Body: (signature)

M. Kashif - Chair of Governors (printed)

Appendix 1

Low Level Concern Report Form

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:
• is not consistent with the 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.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

This form should be completed and given to the Headteacher as soon as possible.

Details of Child
Child's Name:
Child's Class:
Details of person reporting concern
Name:
Job Title:
Details of person whom the concern relates to
Name:
Job Title:
Details of concern
What happened (What was said, observed, reported. Please include as much detail as possible)
Date of concern:
Location of concern:
How did you become aware of the concern?:
Names of others present if applicable:
Action taken: (What did you do following the incident/disclosure/concern?)

Any other relevant information	
Signed:	Date and time:

Checklist for completing low level concern form:

- Concern described in sufficient detail?
- Distinguished between fact, opinion and hearsay?
- Child's own words used? (Swear words, insults or intimate vocabulary should be written down verbatim)
- Free from discrimination/stereotyping or assumptions?
- Concern recorded and passed to Headteacher in a timely manner?

For completion by the Headteacher:

Headteacher Response:	
Date and time reported to Headteacher:	
LADO Contacted: Yes / No	
Has consideration been given to whether this forms part of a wider pattern of behaviour? Yes / No If yes, please provide details	
Action Taken:	
Rationale for decision making / action taken:	
Outcome of Action taken:	
Signed:	Date and time: