Warren Park Primary School

Low Level Concerns Policy

Reviewed by:	FGB	Responsibility:	FGB
Last Review:	October 2026	Next Review:	October 2027
Review Cycle:	Annually	Ratified by FGB:	12.10.2026
Chairperson's signature:			

1.0 Policy statement

1.1 Our school recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

1.2 Our school works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

2.0 Scope

2.1 All employees employed at this school including:

- Teachers
- Support staff
- Supply teachers
- Volunteers
- Local Authority visiting staff
- Contractors

2.2 The term 'staff' throughout this policy refers to all of the above.

3.0 Policy aims

3.1 To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.

3.2 To enable schools to identify concerning, problematic or inappropriate behaviour early.

3.3 To minimise the risk of abuse occurring.

3.4 To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.

3.5 To help create an environment where staff are comfortable 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.

4.0 Definition

4.1 The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.

4.2 'Keeping Children Safe in Education' defines a low level concern as:
"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"*

5.0 Avoiding low level concerning behaviour

5.1 Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

5.2 Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

5.3 Our school ensures that staff are clear about what appropriate behaviour is through their induction and regular reinforcement of documents such as:

- Staff Code of Conduct
- 'Avoiding Allegations' guidance
- Safeguarding and Child Protection policies and regular training
- Teachers' Standards (for teaching staff)

6.0 Reporting a low level concern

6.1 Low level concerns should normally be reported directly to the Headteacher as per the school's Child Protection procedures using the reporting form (Appendix 1).
Where the concern relates to the Headteacher, it must be reported to the Chair of Governors.

The Designated Safeguarding Lead may support the management of low-level concerns but responsibility for determining and managing concerns rests with the Headteacher.

6.2 Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

6.3 Staff are encouraged and expected to self-report where they believe they may have acted in a manner inconsistent with the Code of Conduct, have found themselves in a situation that could be misinterpreted, or where their actions may have fallen below expected professional standards.

7.0 Dealing with a low level concern

7.1 Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Headteacher.

7.2 The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes.

- Allegations that meet the harm threshold will be referred to the Local Authority Designated Officer (LADO) for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be managed through the school's staff conduct and safeguarding procedures

7.3 The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

8.0 Recording a low level concern

8.1 All low level concerns should be formally recorded using the reporting form (Appendix 1) by a member of staff when they are made aware of them. This record should then be passed to the Headteacher (or Chair of Governors if the concern is about the Headteacher).

8.2 The record should include:

- Details of the concern,
- The context in which the concern arose,
- The outcome of the investigation and any action taken, and
- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible)

8.3 Relevant records will be retained confidentially on the personnel file. The Headteacher will maintain a confidential central record of all low-level concerns. All records must be kept in line

with data protection principles and will be retained in accordance with the school's data retention schedule and relevant safeguarding guidance.

9.0 Reviewing a low level concern

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

9.2 Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

9.3 The school will take advice, where appropriate, from their HR provider in respect of low level concerns.

9.4 The school will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

9.5 Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance). Low level concerns which relate solely to safeguarding will not be included in a reference, subject to paragraph 9.7.

9.6 A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

10.0 Related guidance

10.1 The policy links to the following guidance documents:

- Keeping Children Safe in Education (DfE)
- Model Code of Conduct (Manual of Personnel Practice)
- Avoiding Allegation guidance (Manual of Personnel Practice)
- Safeguarding Policy (Safeguarding Unit)
- Child Protection Policy (Safeguarding Unit)

This policy should be read alongside the Staff Code of Conduct.

Appendix 1

Warren Park Primary: Record of low level concern	
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 Warren Park Code of Conduct • Relates to their conduct outside of work which has caused a sense of unease about an adult's suitability to work with children Please provide a concise record – including brief context in which the concern arose and details that are as precise and accurate as possible. The record should be signed, timed and dated.	
Name of member of staff sharing the concern (optional)	
Role	
Date and time of form completed	
Name of staff member referred to in the concern	
Role and relationship with member of staff (manager / colleague)	
Details of the concern	
Signed	
Date and time	

For use of the Headteacher / DSL / DDSL	
Date and time concern received	
Name	
Role	
Actions to be taken and follow up	