



**St Helens Primary School**

# **Low Level Concerns Policy**

Reviewed by: FGB

On: October 2025

Next review due: October 2026

Chair of Governors: Matthew Searle

Signature: 

## **Low-Level Concerns Policy**

### **St Helens Primary School**

**Please read in conjunction with:**

**Safeguarding Policy**  
**Child Protection Policy,**  
**The Staff Code of Conduct**

## **Introduction**

At St Helens 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.

### **Defining a Low-Level Concern**

**A low-level concern is one that does not meet the harm threshold as stated in the school's Safeguarding Policy.**

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate.

In KCSIE (Keeping Children Safe in Education), low-level concerns are instances where an adult's behaviour is inconsistent with the staff code of conduct, but doesn't reach the threshold for abuse or harm. The purpose of a low-level concerns policy is to foster an open and reflective culture, enabling early identification of potentially harmful patterns before they escalate. Concerns should be reported to the head teacher (or designated safeguarding lead), recorded, and reviewed to identify patterns that could indicate risk.

A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. See appendix 1.

If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead.

### **Keeping Children Safe in Education September 2025**

The following information is taken from Keeping Children Safe in Education September 2025

428. 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.

429. 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

430. 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, or
- humiliating children.
- using inappropriate sexualised, intimidating or offensive language.

431. 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.

432. 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 109 or other adult within or outside of the organisation; or as a result of vetting checks undertaken

433. 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. Staff code of conduct and safeguarding policies

434. As good practice governing bodies and proprietors should set out their low level concerns policy within their staff code of conduct and safeguarding and child protection policies as set out in Part two of this guidance. They should make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e., to create and embed a culture of openness, trust and transparency in which the school or college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

435. As set out in Part two of this guidance, the governing body or proprietor should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

436. Schools and colleges can achieve the purpose of their low-level concerns policy by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in the school or colleges safeguarding system.

#### Sharing low-level concerns

437. Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values champion)), or with the headteacher/principal is a matter for the school or college to decide.

If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.

438. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

439. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

440. Schools and colleges should ensure they create an environment where staff are encouraged and feel confident 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.

#### Recording low-level concerns

441. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual

sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

442. Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

443. Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one). 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.

444. It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

## References

445. Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding concerns/allegations (including a group of low level concerns about the same individual) that meet the harm threshold in references. 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. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

## Responding to low-level concerns

446. The school or college low-level concerns policy should set out the procedure for responding to reports of low-level concerns. If the concern has been raised via a third party, the headteacher/principal (or a nominated deputy) should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

447. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

448. A good low-level concerns policy will simply be a reflection and extension of the school or college's wider staff behaviour policy/code of conduct.

449. More detailed guidance and case studies on low-level concerns can be found in: Developing and implementing a low-level concerns policy: a guide for organisations which work with children (farrer.co.uk).

## **Responsibilities of staff**

It is important that all staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct.

This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for new staff. It is crucial that any concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the head teacher.

This should be done without delay. Where there are concerns/allegations about the head teacher, this should be referred to the Chair of Governors.

## **Dealing with Low-Level Concerns**

All low-level concerns may be shared verbally with the head teacher in the first instance, but must then be recorded in writing. The record should include:

- details of the concern
- the context in which the concern arose
- action taken. The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

### Procedures for responding to a Low-Level Concern

1. The head teacher will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where:
  - (a) the threshold is met for a higher-level concern/allegation
  - (b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
  - (c) there is other information which when taken into account leads to a higher-level concern/allegation.
2. Where the Head teacher is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.
3. Having established that the concern is low-level, the Headmaster will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary.
4. If the concern has been raised via a third party, the Headmaster should collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously
  - to the individual involved and any witnesses.
5. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

6. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
7. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised and will be dealt with by means of management guidance and training. This will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate.

## **Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct**

### **Allegation**

**Behaviour which indicates that an adult who works with children has:**

- **behaved in a way that may have 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 that they pose a risk of harm to children.**

### **Low – Level Concern**

- **Any concern – no matter how small, even if no more than a nagging doubt – that an adult may have acted a manner which:**
- **Is not consistent with the school's 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 that adult's suitability to work with children.**

### **Appropriate Conduct**

- **Behaviour with is entirely consistent with the school's code of conduct and the law.**

## **Storing and use of Low-Level Concerns and follow-up information**

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave St Helens, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

## Appendix 1

## Low Level Concern Form

This form can be used to share any concern with the Head teacher/Designated Lead, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

## **Details of CONCERN :**

<p><b>Name of Staff member :</b></p>	
<p><b>Department and Role :</b></p>	

---

**Received by :**

At [time] :	Date :
<p><b>WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].</b></p> <p>NO <input type="checkbox"/> - Give a brief but valid reason/explanation for not;</p> <p><b>YES <input type="checkbox"/> - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :</b></p>	
<p><b>ACTION TAKEN :</b></p>	
<p>Was advice/guidance sought from the LADO and or Human Resources? Yes : <input type="checkbox"/> No : <input type="checkbox"/></p>	
<b>Signed :</b>	<b>Dated :</b>

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated