



19. Low Level Concerns Policy

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Issue or revision no.	1

Low-Level Concerns Policy

Holmer Church of England Academy

Low-Level Concerns Policy (Staff Conduct)

1. Introduction

At Holmer C of E Academy, safeguarding and promoting the welfare of children is everyone's responsibility. This includes ensuring that all adults who work with, or on behalf of, children do so in a way that is consistent with the school's Christian ethos, values and policies, including the Staff Code of Conduct.

This policy sets out the processes for all staff, governors, supply staff, students on placement, volunteers and contractors regarding any **low-level concerns** they may have about the conduct of an adult working in or on behalf of the school.

This policy should be read alongside:

- the Child Protection and Safeguarding Policy;
- the Staff Code of Conduct;
- the Relational and Co regulation Behaviour Policy;
- the Whistleblowing Policy;
- the Safer Recruitment Policy;
- *Keeping Children Safe in Education* (KCSIE) 2026;
- *Working Together to Safeguard Children* 2026.

Holmer C of E Academy is committed to creating and maintaining an open, transparent and safe culture, where all concerns about adults are taken seriously, responded to promptly and recorded appropriately.

2. Purpose and Summary

Sometimes a member of staff or other adult may act in a way that does not pose an immediate or obvious risk to a child but is nevertheless inappropriate, inconsistent with the Staff Code of Conduct or gives rise to a sense of unease or "nagging doubt".

This policy aims to:

- encourage staff to report any such concerns – however small – as **low-level concerns**;
- ensure that concerns are shared with the right person, promptly;
- ensure appropriate recording, review and response;
- identify patterns of behaviour early, in order to minimise the risk of abuse;
- protect pupils and also protect staff from false allegations or misunderstandings.

Any member of staff or adult working in or on behalf of the school who has a concern about another adult's behaviour **must** inform the Headteacher using the Low-Level Concern Record Form.

- If the Headteacher is unavailable, the concern should be reported to the Deputy Headteacher.
- If the concern is about the Headteacher, it must be reported to the Chair of Governors.

- If at any point it is believed that a child has suffered, or is likely to suffer, significant harm, the school's Child Protection and Safeguarding procedures and the Managing Allegations procedures (including contact with the LADO) will be followed without delay.

3. National guidance context (KCSIE 2026)

As part of their whole-school approach to safeguarding, schools must promote an open and transparent culture in which **all concerns about all adults** working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are:

- shared responsibly and with the right person;
- recorded and dealt with appropriately;

is critical. When implemented correctly, this:

- encourages an open and transparent culture;
- enables the school to identify concerning, problematic or inappropriate behaviour early;
- minimises the risk of abuse;
- ensures that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in line with the ethos and values of the school.

Working Together to Safeguard Children 2026 emphasises that all organisations working with children must have clear policies and processes for sharing and responding to concerns about adults' behaviour, including those that appear low-level, as part of their wider safeguarding systems.

4. What is a low-level concern?

A **low-level concern** does **not** mean that it is insignificant. It means that the behaviour towards a child does **not** meet the threshold for a **harm allegation** (i.e. it does not appear to indicate that a person may have:

- harmed a child,
- committed a criminal offence against or related to a child, or
- behaved towards a child or children in a way that indicates they may pose a risk of harm),

and does not otherwise appear to meet the threshold for referral to the Local Authority Designated Officer (LADO).

A low-level concern is **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, including inappropriate conduct outside of work; **and**
- does not meet the allegations/harm threshold and is not, on its own, considered 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";

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, contrary to agreed practice;
- using inappropriate, intimidating or offensive language;
- making personal comments about a child's appearance that could be misinterpreted;
- socialising online with pupils, or ex-pupils of a vulnerable age, contrary to policy;
- any behaviour that could be perceived as grooming.

Such behaviour can exist on a wide spectrum, from inadvertent or thoughtless actions, or behaviour that may appear inappropriate but may not be in specific circumstances, through to behaviour that could ultimately be intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Dealing with low-level concerns effectively also protects adults from potential false allegations or misunderstandings.

5. Distinguishing between an allegation, a low-level concern and appropriate conduct

To help staff understand what to report and how:

5.1 Allegation (harm threshold met)

This is where it is alleged that 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 in a way that indicates they may not be suitable to work with children.

Such concerns **must** be reported to the Headteacher (or Chair of Governors if the concern is about the Headteacher) immediately and will be managed in line with the **allegations against staff** procedure, including contact with the LADO.

5.2 Low-level concern

This is any concern, however small, about an adult's behaviour that is inconsistent with the Staff Code of Conduct or professional boundaries, but does **not** meet the harm threshold described above.

These concerns are reported using the **Low-Level Concern Record Form** and are managed under this policy.

5.3 Appropriate conduct

This is behaviour that is fully in line with the Staff Code of Conduct, professional expectations and the school's ethos and values.

Where there is uncertainty about how a behaviour should be categorised, staff should **discuss it with the Headteacher, DSL or a senior leader**. If in doubt, **report it**.

6. Reporting low-level concerns

All adults working in or on behalf of the school have a duty to report low-level concerns. Staff must:

1. **Promptly complete a Low-Level Concern Record Form** as soon as reasonably possible after the concern arises.
2. **Submit the form to the Headteacher.**
 - If the Headteacher is unavailable, submit the form to the Deputy Headteacher.
 - If the concern is about the Headteacher, report directly to the Chair of Governors.
3. **Maintain confidentiality**, sharing the concern only with the Headteacher (or appropriate senior leader) and not discussing it with others unless authorised.

Staff may also seek advice or support from the Designated Safeguarding Lead (DSL) when in doubt about whether a matter should be recorded as a low-level concern, but this does **not** replace completing the form where a concern exists.

The culture of the school is one where raising concerns is seen as a **positive and protective act**, not as disloyalty.

7. School response to low-level concerns

On receiving a low-level concern, the Headteacher (or nominated senior leader) will:

1. **Review the information** and clarify details with the person reporting, if needed.
2. **Check existing records** to see whether similar concerns have previously been raised about the same individual, in order to identify any pattern.
3. **Decide on the appropriate response**, which may include:
 - no further action (where the behaviour is judged to be consistent with the code of conduct and can be explained and documented as such);
 - informal advice, guidance or additional training;
 - updating or reinforcing expectations of conduct;
 - supervision or additional support;
 - review of risk assessments or working practices;
 - escalation to the harm threshold/Managing Allegations procedure and contact with the LADO if new information or patterns suggest a higher level of concern.
4. **Record the rationale** for the decision and any actions taken.

Throughout, the Headteacher (or senior leader) may take advice from the DSL and, where relevant, from the Local Authority Designated Officer (LADO).

8. Storage, confidentiality and use of low-level concern records

Low-Level Concern forms and any follow-up information will be:

- stored securely within the school's confidential safeguarding or personnel systems;
- kept separate from general personnel records where appropriate, but cross-referenced if needed;
- accessible only to the Headteacher and members of the senior leadership team with designated responsibility (and, where necessary, the DSL and/or Chair of Governors).

All records will be held and managed in line with:

- the school's Data Protection Policy;
- the school's Records Retention and Safeguarding Records Guidance;
- the Data Protection Act 2018 and UK GDPR.

The staff member(s) reporting the concern must keep the information confidential and must not share the concern with others apart from the Headteacher or those within the senior leadership team who are managing the issue.

Low-level concerns will **not** normally be referred to in employment references, **unless**:

- they have been re-classified as allegations that met the harm threshold and resulted in disciplinary or misconduct procedures; or
- a pattern of low-level concerns, together with other information, raises a question about the individual's suitability to work with children, and it would be misleading or unsafe not to make an appropriate reference.

Whenever staff leave Holmer C of E Academy, any record of low-level concerns stored about them will be reviewed to decide whether the information needs to be retained. In making this decision, the school will consider:

- whether some or all of the information may have any reasonably likely value in terms of a potential historic employment or abuse claim, in line with normal safeguarding records practice; or
- whether, on balance, the record is not considered to have any reasonably likely value or actionable concern and should therefore be deleted in line with data protection and retention schedules.

The welfare of children will always be a primary consideration in decisions about record retention.

9. Links to other procedures and training

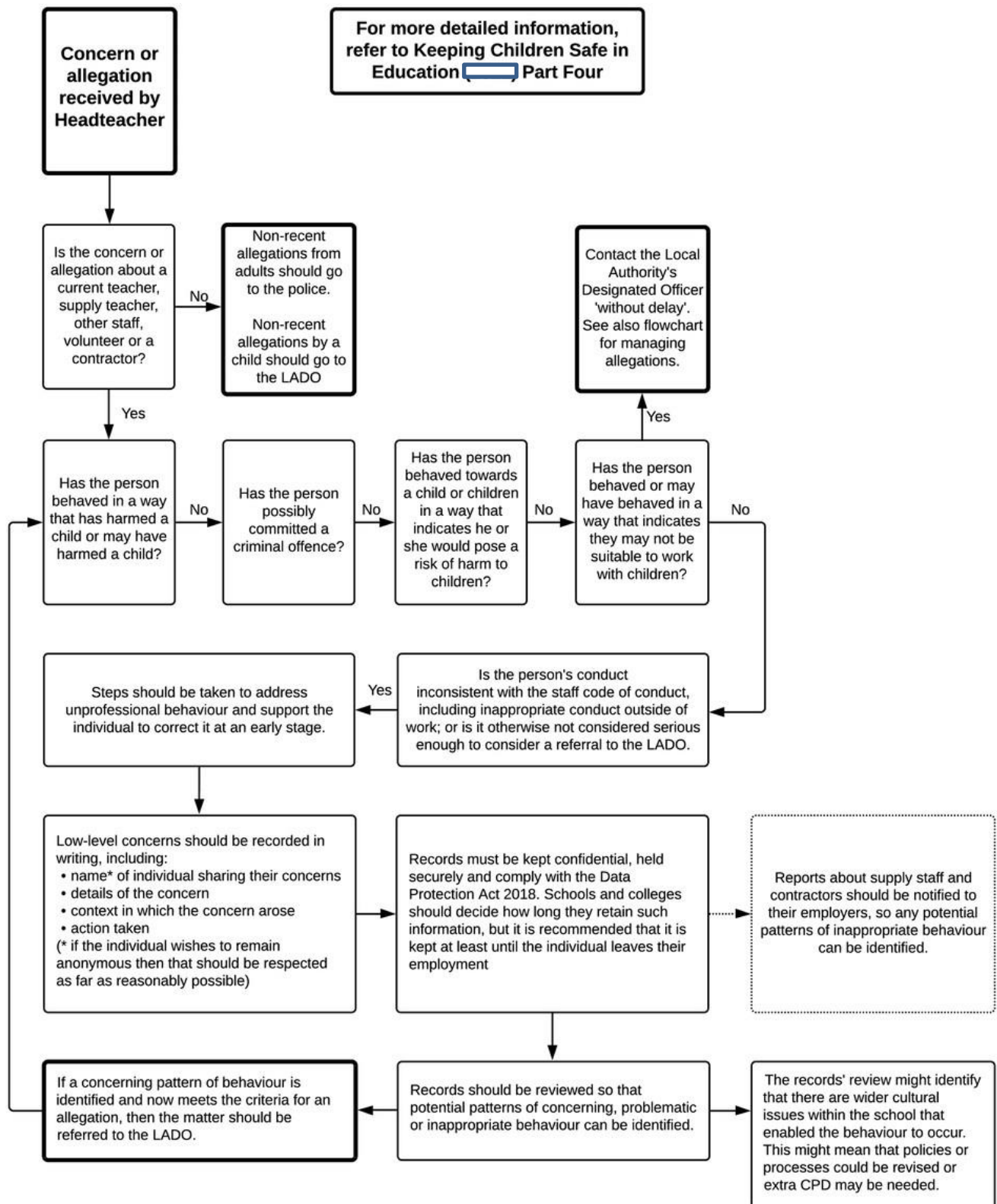
This policy is part of the school's wider safeguarding system and links directly to:

- Child Protection and Safeguarding procedures (including early help and referrals);
- Managing Allegations procedures and LADO referrals;
- the Whistleblowing Policy;
- the Staff Code of Conduct and professional standards;
- Safer Recruitment and induction procedures;
- ongoing safeguarding and conduct training for all staff.

All staff will receive training on this policy as part of safeguarding induction and regular updates, so they:

- understand what a low-level concern is;
- know how to share concerns and with whom;
- appreciate the importance of an open and transparent culture where concerns about adults are raised and addressed.

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



Low Level Concern Form

This form will be available to staff via:

- The school network – common staff / safeguarding / low level concerns form
- The Office
- DSLs
- The Senior Leadership Team

Where possible please speak to the Head Teacher as soon as possible and pass completed forms to the Head Teacher. For concerns relating to the Head Teacher please speak to the Chair of Governors.

1. Appendix 1 - Low-level Concern Reporting Form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Headteacher. Please refrain from discussing this concern with anyone other than the Headteacher. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details

Name (optional)	
Role	
Date and time of completing this form	

Details of individual whom the concern is about

Name	
Role	
Relationship to the individual reporting the concern, e.g. manager, colleague	

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 concern

Details of any children or young people involved

Name(s)	
Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.	

Next steps

What would you like to see happen in response to your concern?		
Are you willing to meet with the Headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		

For use by safeguarding team upon receipt of concern

Date and time concern received	
Signature of DSL	
Actions to be taken, e.g. no action, investigation, reclassification as allegation meeting the harms threshold.	