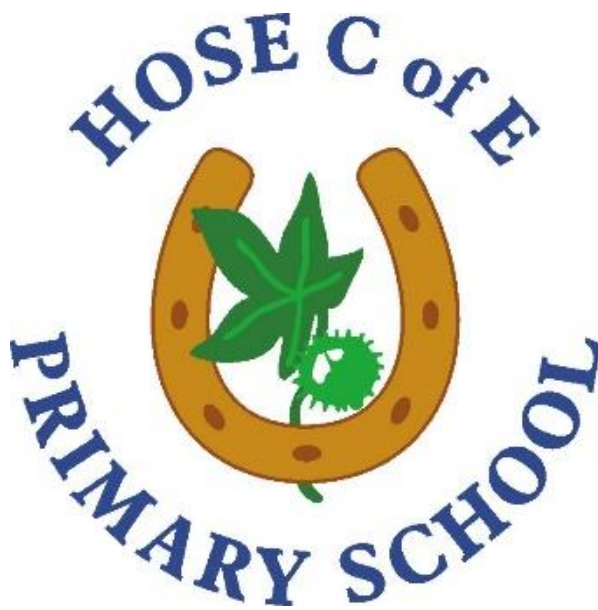


# Hose Church of England Primary School Low-Level Concerns Policy



**Respect, Bravery, Success, Pride**

**'Whatever you do, work at it with all your heart' Colossians 3:22**

Written August 2026

Adopted on 1<sup>st</sup> September 2025 by 'Chair's Action'

Member of staff responsible: Mrs L Hough

Chair of Governors: Emily Greasley

Review Date: August 2027

**This policy supports our Safeguarding/Child Protection policy and is reviewed alongside it annually, by the governing body.**

# Low-level Concerns Policy

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## 1.0 Purpose

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the “Guidance for safer working practice for those working with children and young people in education settings” (Feb 2022) are lived, monitored, and reinforced. The school recognises that effective management of low-level concerns is an important element of a strong safeguarding culture and helps identify concerning patterns of behaviour at an early stage.

The policy should be read in conjunction with the current statutory guidance –Keeping Children Safe in Education (KCSIE) 2026, Part Four: Concerns or allegations made about staff, including supply teachers, volunteers and contractors, Section Two: Concerns that do not meet the harm threshold ('low-level concerns').

## 2.0 Who does the policy apply to?

This policy applies to all staff and other individuals who work or volunteer in school.

## 3.0 Definition of a low-level concern

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 may have acted in a way that:

- is inconsistent with the staff code of conduct or the expectations of the school, including inappropriate conduct outside of work; and/or
- does not meet the harm threshold, or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

Such behaviour may exist on a spectrum from inadvertent or thoughtless behaviour, to behaviour which may ultimately be intended to enable abuse. Low-level concerns may arise from suspicion, complaint, disclosure by a child, parent or adult, or as a result of information obtained through other safeguarding processes.

## 4.0 Reporting low-level concerns

Where a low-level concern has been identified this will be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened.

Where the headteacher is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (ie the most senior member of SLT acting in this role).

Low-level concerns about the Designated Safeguarding Lead will be reported to the Headteacher and those about the headteacher will be reported to the Chair of Governors. A low-level concern about a supply teacher or contractor will be reported to their employer.

Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the headteacher of the details as soon as possible.

## 5.0 Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

Where concerns are reported verbally to the headteacher a record of the conversation will be made by the headteacher which will be signed, timed, and dated and logged in the Low Level Concerns Tracker.

## 6.0 Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The headteacher will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behavior;
  - i) is consistent with the “Guidance for safer working practice for those working with children and young people in education settings” (Feb 2022): no further action will be required,
  - ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy.
  - iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
  - iv) 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 or Police: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
- Records will be made of,
  - i) all internal conversations including any relevant witnesses,
  - ii) all external conversations eg with the LADO
  - iii) the decision and the rationale for it, iv) any action taken

## 7.0 Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not

possible e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

## 8.0 Should staff report concerns about themselves (i.e. self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the “Guidance for safer working practice”. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Staff should feel empowered to self-refer where they believe their conduct may have fallen below expected professional standards. Self-reporting will be viewed as a positive contribution to the school's culture of openness and safeguarding, although this will not prevent appropriate management action where required.

## 9.0 Where behaviour is consistent with the “Guidance for safer working practice” (Feb 2022)

Feedback will be given to both parties to explain why the behaviour was consistent with the “Guidance for safer working practice”.

## 10.0 Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

Records will be kept securely, separate from personnel files, and retained in accordance with the school's data retention schedule. Where a pattern of concerns emerges, the information will be reviewed to determine whether the harm threshold has been met and whether referral to the LADO is required.

## 11.0 Confidentiality

Information relating to low-level concerns will be shared only with those who have a legitimate need to know. Staff should understand that low-level concerns cannot be completely confidential, as information may need to be shared to safeguard children, ensure fair procedures, or comply with legal obligations.

## 11.0 References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

## 12.0 What is the role of the Governing Body?

The Governing Body will ensure that:

- there is an effective low-level concerns procedure in place;
- staff understand how to raise concerns;

- records are maintained appropriately;
- the policy is reviewed annually alongside safeguarding policies and procedures;
- leaders promote an open and transparent safeguarding culture