



Low-Level Concerns Policy

9 October 2026

About This Document

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History

Version	Date	Name	Description
0.1	Sep - 2021	René Esterhuizen, Headteacher	First release. DRAFT
1.0	Sep - 2018	School Governors	Approved and adopted.
1.1	5 Sep - 2022	School Governors	Reviewed and approved.
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1.4	13 Sep - 2025	René Esterhuizen, Headteacher	Reviewed, changes made to indications of low-level concerns.
1.5	9 Oct - 2026	René Esterhuizen, Headteacher	Reviewed, changes made to come in-line with new KCSIE guidelines.

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1. Purpose

- 1.1. This policy should be read alongside the school's Safeguarding Policy, Staff Code of Conduct Policy, Procedures for Managing Allegations Against Adults and Keeping Children Safe in Education 2026.
- 1.2. This policy is based on KCSIE 2026, the 2022 Guidance for Safer Working Practice, and Farrer & Co's 2023 Low-Level Concerns guidance.
- 1.3. 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, trainee 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" (2022) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.
- 1.4. Who does the policy apply to?
 - i. This policy applies to all staff, trainee teachers and other individuals who work or volunteer in the school.
- 1.5. Definition of a low-level concern
 - i. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:
 - a) is inconsistent with the school's Staff Code of Conduct, including inappropriate conduct outside of work; and
 - b) does not meet the harm threshold or is otherwise not serious enough to consider a referral to LADO).
- 1.6. The Staff Code of Conduct is informed by the 2022 Safer Working Practice guidance.
- 1.7. Examples may include, but are not limited to:
 - i. Being overfriendly with children
 - ii. Having favourites
 - iii. taking photographs of children on a personal mobile phone contrary to school policy
 - iv. engaging with a child on a one-on-one basis in a secluded area or behind a closed door
 - v. humiliating a child
 - vi. using inappropriate language or communication; or
 - vii. other behaviour which causes a sense of unease or appears to cross inappropriate professional boundaries

2. Reporting low-level concerns

- 2.1. Low-Level concerns should normally be reported to the Headteacher as soon as reasonably possible. Where the Headteacher is unavailable, they should be reported to the Designated Safeguarding Lead or Deputy DSL, who will inform the Headteacher in a timely manner according to the nature of the concern.
- 2.2. The Headteacher will be the ultimate decision maker in respect of low-level concerns, although they may consult with the DSL as appropriate.
- 2.3. Where a concern relates to the Headteacher, it should be reported to the Chair of Governors and Trustees. Where the Headteacher is also the sole proprietor, or there is a conflict of interest, advice should be sought directly from the LADO.
- 2.4. Where a low-level concern relates to supply staff, a trainee teacher or a contractor, the concern will also be notified to their employer or training provider, as appropriate, so that any potential patterns of inappropriate behaviour can be identified.
- 2.5. If there is any doubt as to whether a concern meets the harm threshold, the Headteacher should consult the LADO.

3. Recording concerns

- 3.1. The purpose of recording and addressing low-level concerns is to create a culture of openness, trust, and professional boundaries. It allows patterns of concerning behaviour to be identified early before they potentially escalate into something more serious.
- 3.2. All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which it arose, the name of the person raising the concern unless anonymity has been requested, and relevant information obtained, decisions made, the rationale for those decisions and any action taken.
- 3.3. Records will be kept confidentially and securely managed in accordance with data-protection law.
- 3.4. Low-level concerns will be addressed internally but thoroughly and proportionately, typically by the Headteacher or Designated Safeguarding Lead, unless they involve those individuals.
- 3.5. Where concerns are reported verbally, the headteacher will ensure that an appropriate written record is made.

4. Responding to low-level concerns

- 4.1. Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The headteacher will:
 - i. Speak to the person reporting the concern to gather all the relevant information.
 - ii. Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO, Police or another relevant statutory agency.

- iii. Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
 - iv. The information reported and gathered will then be reviewed to determine whether the behaviour:
 - a) Is consistent with the school's Staff Code of Conduct and expected standards of professional behaviour: no further action will be required.
 - b) Constitutes a low-level concern: the school will consider whether any proportionate action is required. This may include advice, guidance, additional training, support, management action or, where appropriate, action under the school's disciplinary or capability procedures.
 - c) Is serious enough to consult with or refer to the LADO. If so, a referral should be made to the LADO, and advice should be taken from HR.
 - d) Where the harm threshold is met, or may be met, the school's Procedures for Managing Allegations Against Adults and Safeguarding and Child Protection Policy will be followed.
 - e) Where previous low-level concerns about the same individual indicate a pattern of inappropriate, problematic or concerning behaviour, the school will consider whether further management or disciplinary action is required or whether the pattern now meets the harm threshold, in which case the matter will be referred to the LADO.
- 4.2. Records will be made of:
- i. all internal conversations including any relevant witnesses.
 - ii. all external conversations e.g., with the LADO.
 - iii. the decision and the rationale for it.
 - iv. any action taken.

5. Can the reporting person remain anonymous?

- 5.1. 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, for e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

6. Managing Allegations

- 6.1. Where a concern meets, or may meet, the harm threshold, it must be reported without delay to the Headteacher and managed in accordance with the school's Procedures for Managing Allegations Against Adults, the Safeguarding and Child Protection Policy and Part Four, Section One of KCSIE 2026.
- 6.2. Where the concern or allegation relates to the Headteacher, it must be reported to the Chair of Governors or Trustees or proprietor. Where the Headteacher is also the sole proprietor, or there is a

conflict of interest, the matter should be reported directly to the Local Authority Designated Officer (LADO).

- 6.3. If there is any doubt as to whether the harm threshold has been met, advice should be sought from the LADO.

7. Should staff report concerns about themselves (i.e., self-report)?

- 7.1. 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 expected in the school's Staff Code of Conduct. In these circumstances, they should self-report. This will enable the situation to be addressed at an early stage where necessary.

8. Where behaviour is consistent with the Staff Code of Conduct "Guidance for safer working practice" (2022)

- 8.1. Feedback will be given, where appropriate, to explain why the behaviour was considered consistent with the Staff Code of Conduct and expected standards of professional behaviour.

9. Retention

- 9.1. Low-level concern records will be retained at least until the individual leaves the school's employment, and longer where required by the school's records-retention arrangements or where there is a safeguarding, employment or legal reason to retain them.

10. Should the low-level concerns file be reviewed?

- 10.1. 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.
- 10.2. The review will also consider whether any wider cultural or safeguarding issues within the school may have contributed to the behaviour and whether policies, procedures, supervision or staff training should be revised.

11. References

- 11.1. Substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual which meet the harm threshold, will be included in references where appropriate in accordance with KCSIE 2026.
- 11.2. A low-level concern will normally be included in a reference unless it relates to an issue which would ordinarily be included in a reference, such as misconduct or poor performance. A low-level concern

which relates exclusively to safeguarding and does not meet the harm threshold will not be included in a reference.

12. Training and Awareness

- 12.1. All staff will be made aware of this policy and the importance of sharing low-level concerns as part of their safeguarding induction and ongoing safeguarding training. Staff should understand the distinction between appropriate conduct, a low-level concern and behaviour which may meet the harm threshold.

13. What is the role of the Governing Body?

- 13.1. The headteacher will regularly inform the Governing Body about the implementation of the low-level concerns policy including any evidence of its effectiveness e.g., with relevant data. Individual case details are not routinely provided to governors, except where necessary. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.