



# Low-Level Concerns Policy

**The Positive Impact Group**

**Effective Date**

June 2026

**Review Date**

June 2027



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## Introduction

The Positive Impact Group recognises and takes seriously its responsibility to safeguard and promote the welfare of children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We recognise that all adults within the Positive Impact Group have a full and active part to play in protecting and safeguarding the children in our care, and that the pupil's welfare is our paramount concern.

This policy is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education 2025. This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold. Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

## Definitions and Terminology

The term '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.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children with their mobile phones

- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate, sexualised, intimidating or offensive language

## Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Having clear policies and procedures.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at its earliest stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any areas of weakness in the setting's safeguarding system.

## Reporting a Low-Level Concern

- Low-level concerns about a member of staff should be reported to the Director as per the setting's Child Protection procedures.
- Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.
- Staff should use the school's Low-Level Concerns Reporting Form (see Appendix 1).

## Responding to Low-Level Concerns

If the concern is raised via a third party, the Director will collect evidence where necessary by speaking:

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

The Director will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff Code of Conduct. This includes, but is not limited to:

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low-level concerns that the setting may need further guidance on will be referred to the LADO for advice.
- Low-level concerns that the setting feels it can deal with internally will be dealt with via the setting's usual child protection investigation process.
- The setting will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

## Record Keeping

All low-level concerns will be recorded in writing.

In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, we will refer it to the Local Authority Designated Officer (LADO).
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## Reviewing a Low-Level Concern

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

Where a pattern of such behaviour is identified, the Director 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).

If the concern relates to volunteers or any other concerns arise, the setting can contact the LADO for further advice.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to LADO and is found to be substantiated; and/or
  - The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.
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## Appendix 1

| Low Level Concerns Form                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                   |              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|--------------|
| <p>Please use this form to share any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult may have acted in a way that:</p> <ul style="list-style-type: none"> <li>• is inconsistent with The Positive Impact Group staff code of conduct, including inappropriate conduct outside of work, and</li> <li>• does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.</li> </ul> <p>You should provide a concise record, including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible, of any such concern and relevant incident(s) (and please use a separate sheet if necessary).</p> <p>The record should be signed, timed and dated and returned to the Director.</p> |                   |              |
| <b>Name of Staff Member:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Team/Role:</b> | <b>Date:</b> |
| <p><b>Details of Concern:</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |              |
| <b>Name:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Signed:</b>    | <b>Date:</b> |

This policy is reviewed annually.

Overall responsibility lies with the Director, who liaises with the Senior Leadership Team to ensure a robust and sustainable model of Leadership.

**Signed by Director**



**James Armson**

