Low-Level Concerns Policy
2025-2026

This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. This policy is read alongside the guidance included in:-

Keeping children safe in education, 2025 (TBC)

This policy will be reviewed in full by the Governing Body on an annual basis.

Staff Member(s) Responsible:	Mr C. Bailey
Link Governor Responsible:	Mrs Michelle Keeling Kugelberg
Date Approved by Governors:	01/09/25
Review Date:	01/09/26

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Introduction

This Policy ensures the School's compliance with para ~~431-436 of~~ ~~Keeping Children Safe 2024~~ which states that:

431. 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 107 (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

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 in the following ways, for example, (but are not limited to these):

- 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.

Definition of Low-Level Concerns

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; but
- 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 overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- 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

Incidents which fall short of the threshold could include an accusation that is made second or third hand and the facts are not clear, or the member of staff alleged to have done this was not there at the time.

The Difference between an Allegation and Concern

It is important to be clear whether an incident constitutes an 'allegation'. An allegation is where the alleged incident is sufficiently serious as to suggest that one or more children has or may have been

harmed, or that the alleged behaviour indicates the individual may pose a risk of harm to children (or otherwise meets the criteria above).

In ~~Keeping Children Safe 2024~~ it provides this definition of a low-level concern.

If it is difficult to determine the level of risk associated with an incident the following should be considered:

- Was the incident a disproportionate or inappropriate response in the context of a challenging situation?
- Where the incident involved an inappropriate response to challenging behaviour, had the member of staff had training in managing this?
- Does the member of staff understand that their behaviour was inappropriate and express a wish to behave differently in the future? For example, are they willing to undergo training?
- Does the child or family want to report the incident to the police, or would they prefer the matter to be dealt with by the employer?
- Have similar allegations been made against the employee – is there a pattern developing?

In ~~Keeping Children Safe 2024~~ it states that if there is 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 and thus should be treated as an allegation, the Local Authority Designated Officer (LADO) should be consulted.

As good practice, the school may wish to include the LADO in discussions as to whether the issue should be dealt with as an allegation of harm or a concern. If the decision is reached that the concern falls short of the harm threshold, there may still be a role for the LADO to provide advice and support to the employer. Such a consultation process may allow for concerns to be evaluated objectively and to ascertain whether similar concerns may have been raised by a previous employer but not met the threshold for investigation. Whilst the LADO will only record the details of those allegations which appear to meet the threshold for consideration set out above, the School will record the details of any low-level concern that arises in respect of a member of their staff.
Where it is decided that the incident does not meet the threshold of harm/risk of harm and is a concern only, then the school will take steps to ensure any conduct or behaviour issues are addressed with the member of staff through normal employment practices. The school should take into account Teaching Standards: Guidance for school leaders, school staff and governing bodies (Updated 2021) Teachers' Standards guidance (publishing.service.gov.uk) when considering personal and professional conduct.

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 with the DSL/Headteacher/Chair of Governors/Local Authority Designated Officers

- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Reporting a low-level concern

- Low level concerns about a member of staff should be reported to the Headteacher as per the school's Child Protection procedures.
- If the concern is about the Headteacher this should be reported to the Chair of Governors.
- 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 (appendix one.)

Responding to low-level concerns

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, although it is recognised that depending on the nature of the concern, the headteacher/principal may wish to consult with the Designated Safeguarding Lead (DSL) and take a more collaborative decision-making approach. If concerns relate to the Headteacher then the Chair of Governor/Safeguarding Governor should decide on whether the concern is a low-level concern or not.
If the concern is raised via a third party, the headteacher/Chair of Governor/Safeguarding Governor 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 headteacher/Chair of Governor/Safeguarding Governor 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. The person responsible will also ensure:

- Allegations that meet the harm threshold will be referred to the LADO for advice
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's behaviour policy/code of conduct.
- The school 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 (See Appendix 1). 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 the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher/Chair of Governor 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 as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- 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 Headteacher/Chair of Governor/Safeguarding Governor 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 volunteers, or any other concerns arise, school 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 the designated officer at the local authority 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

Appendix 1.

Low-Level Concern Form

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:

- is inconsistent with Alleyne's Academy staff code of conduct, including inappropriate conduct outside of work, **and**
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO

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).

The record should be signed, timed, and dated and returned to the Headteacher

Name of staff member: Team & Role: Details of Concern:		
Date:	**Signed:**	**Name:**