



Policy:	Low Level Concerns 2025-2026
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Key changes/notes:
<p>This The Education People model policy. It is based upon the DfE 'Keeping Children Safe in Education' document 2025</p> <p>Significant changes from the 2024 version are highlighted.</p>

Statutory Requirement:	Yes – Department of Education
Proposed Renewal Cycle:	Annually
Proposed annual review authority:	Governing Body
Policy Section:	Governnance

<p>Let the children come to me and do not hinder them, for the kingdom of God belongs to such as these." (Luke 18:16)</p> <p>This policy is based upon our Christian values of thankfulness, respect, honesty, love and resilience.</p>
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## **Introduction**

At St Mary's CE Primary School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the procedure for low level concerns raised about staff and volunteers.

## **Summary**

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using a Low-Level Record of Concern Form. If the Head Teacher cannot be contacted, the Chair of Governors should be contacted instead. Staff are able to make contact with Fr Dane Batley Gladden (Chair of Governors) by email or telephone.

## **Keeping Children Safe in Education 2024**

76. Governing bodies and proprietors have a strategic leadership responsibility for their school or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times. Headteachers and principals should ensure that the policies and procedures, adopted by their governing bodies and proprietors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

78. Governing bodies and proprietors should have a senior board level (or equivalent) lead to take leadership responsibility for their school or college's safeguarding arrangements

## **What is a low-level concern?**

433. 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, and
- 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 over friendly with children
- having favourites

- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

434. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

435. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

436. It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings

#### 4. Low Level Concerns and Appropriate Conduct

<b>Allegation</b>
Behaviour which indicates an adult who works with children has: <ul style="list-style-type: none"> <li>• Behaved in a way which has harmed a child, or may have harmed a child</li> <li>• Possibly committed a criminal offence that has harmed a child or may have harmed a child.</li> <li>• Behaved towards a child or children in a way that indicates that they may pose a risk of harm.</li> </ul>
<b>Low Level Concern</b>
Any concern – no matter how small, even if no more than a nagging doubt – that an adult may have acted in a manner which: <ul style="list-style-type: none"> <li>• Is not consistent with the school Code of Conduct</li> <li>• Relates to their conduct out of work, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.</li> </ul>
<b>Appropriate Conduct</b>
Behaviour which is entirely consistent with the school's Code of Conduct and the law.

#### 5. Storage of Concerns and Follow Up

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave St Mary's, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

- (a) whether some or all of the information contained within any record may have any reasonable value in terms of any potential employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonable value, still less actionable concern, and ought to be deleted accordingly.

## Procedure

If the Headteacher receives a concern or allegation, they will assess if the concern or allegation is about a current teacher, supply teacher, other staff member, volunteer or contractor.

If 'yes'	If 'no'
Has the person behaved in a way that has harmed a child, or may have harmed a child?	Non recent allegations from adults should be referred to the police. Non recent allegations from a child should be referred to the LADO.

If the concern or allegations relates to a current member of staff, volunteer supply teacher or contractor, the Headteacher needs to assess whether the person has behaved in a way that has harmed a child or may have harmed a child?

If 'no':

- Has the person possibly committed a criminal offence?
- Have they behaved in a way which would indicate that they pose a risk to a child?
- Have they behaved in a way that indicates they may not be suitable to work with children?
- Is their behaviour consistent with the school Code of Conduct?

If 'yes':

If a concerning pattern of behaviour is identified, and/or the incident now meets the criteria for an allegation, then the matter should be immediately referred to the LADO.

It is important to remember that, where possible, steps should be taken to address unprofessional behaviour, and support the individual to correct this at an early stage.

Low level concerns should be recorded in writing, and should include:

- Name of individual
- Concern
- Any other members of staff who share the concern
- Context
- Details

N.B. If you try to record any incidents regarding staff on Safeguard my School, you will be referred immediately to the headteacher, Mrs Amanda McGarrigle.

Members of staff who ask to remain anonymous will have their wishes respected as far as is reasonably possible.

Records will be kept confidentially and securely in accordance with the Data Protection Act 2018.

Reports about supply staff and contractors will be referred to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Records will be reviewed to identify any patterns of behaviour, which could indicate a wider cultural pattern in the school which needs to be addressed, and which enables inappropriate behaviour to be tolerated.

## **7. Key Reference Document**

Read the following document for further information:

<https://www.farrer.co.uk/news-and-insights/developing-and-implementing-a-low-level-concerns-policy-a-guide-for-organisations-which-work-with-children/>

## LOW LEVEL CONCERN FORM

What are you concerned about:

Was anyone else there?

If children were involved, which children (names)?

Who has behaved in a way which is concerning?

After completing a low level concern form, information must be kept confidential.

Your name:

Date:

Signed: