Low Level Concerns Policy

The Willows Primary School

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Low-Level Concerns Policy at The Willows Primary School

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1. Introduction

This policy applies to all adults working in or on behalf of the school, including employees, supply and agency staff, trainee teachers, volunteers, contractors and other third-party staff. Read it alongside the Staff Code of Conduct, Child Protection Policy, Whistleblowing Policy, allegations procedure and relevant data-protection and retention arrangements.

The school will promote an open and transparent culture in which concerns are shared responsibly, recorded and addressed promptly. 'Low-level' does not mean unimportant or that a concern may be ignored.

At The Willows 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 detail and processes for staff regarding low-level concerns they may have.

2. Summary

Any concern, however small, must be shared without delay. Staff should normally report directly to the Headteacher, Mrs Sarah Thursfield, and complete the form as soon as practicable. A form must never delay verbal reporting or safeguarding action. If the concern is about the Headteacher, report it to the Chair of Governors using the agreed contact route. If the Chair is the subject, use the alternative route agreed by the governing body. Insert and maintain the relevant names and contact details.

The Headteacher is the ultimate decision-maker for low-level concerns and may consult the DSO or others where appropriate. A concern must not be dismissed because the person is trusted, experienced or well-regarded.

3. Keeping Children Safe in Education September 2026

A low-level concern is any concern, no matter how small, including a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted inconsistently with the Staff Code of Conduct, including through conduct outside work, and the concern does not meet the harm threshold or is not otherwise serious enough to warrant referral to the LADO.

Examples may include being over-friendly with children; having favourites; taking photographs of children on a personal mobile phone contrary to school policy; engaging in one-to-one contact in a secluded area or behind a closed door without appropriate justification; humiliating children; or using inappropriate sexualised, intimidating or offensive language. Examples are not exhaustive.

4. Clarity around Allegation vs Low Level Concern vs Appropriate Conduct

Harm-threshold concerns must be managed under the allegations procedure, not solely as low-level concerns. The threshold includes conduct that may have harmed a child; possibly committing a criminal offence against or related to a child; behaviour indicating a risk of harm; or behaviour indicating the adult may not be suitable to work with children. Contact the Local Authority Designated Officer (LADO) without delay where the threshold may be met. If unsure, seek LADO advice rather than making assumptions. If a child is in immediate danger or a crime may be occurring, take urgent protective action and contact emergency services/police as appropriate.

Allegation
Behaviour which indicates that an adult who works with children has:

- behaviour in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

Low level concern
Any concern – no matter how small, even if no more than a 'nagging' doubt – that an adult may have behaved in a manner which:

- is not consistent with an organisation's Code of Conduct and/or
- relates to their conduct outside of work which, 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

Appropriate conduct
Behaviour which is entirely consistent with the organisation's Code of Conduct and the law.

5. Storing and use of Low-Level Concerns and follow-up information

Keep a clear, confidential and accessible process for recording and sharing concerns. Record the concern, context, date/time received, adult's name and role, reporter's name (unless anonymous), actions taken, advice sought, decisions and rationale, outcomes and follow-up. Distinguish direct observations from hearsay or opinion and record information objectively.

Store records securely with access restricted to those who need the information for safeguarding or employment purposes, in accordance with UK GDPR, the Data Protection Act 2018 and the school's retention schedule. KCSIE recommends retaining records at least until the individual leaves their employment. Check the school's retention arrangements before deletion.

Review records periodically and when new concerns arise to identify patterns, cumulative concerns or wider cultural/procedural issues. If a pattern means the harm threshold may now be met, consult the LADO without delay and follow the allegations procedure. Concerns about supply staff and contractors should be shared with their employer/agency as appropriate; the school should retain its own record.

Encourage staff to self-refer where their own actions could be misinterpreted, appeared compromising or fell below expected standards. Consider anonymous concerns and respect anonymity as far as reasonably possible, while recognising that absolute confidentiality cannot always be guaranteed.

Low-level concern records should not automatically be included in employment references. Any reference must be accurate, fair and consistent with current legal requirements; seek HR/legal advice where necessary.

Process:
(1) listen and take the concern seriously; do not promise absolute confidentiality;
(2) report to the Headteacher without delay, or to the Chair/approved alternative route if the concern is about the Headteacher/Chair;
(3) record the facts, context, actions and decisions/rationale;
(4) assess whether the harm threshold may be met and, if so or in doubt, contact the LADO promptly and use the allegations procedure;
(5) consider immediate safeguarding measures and advice from the DSL, HR or agencies;
(6) decide and document a proportionate response, including discussion, support, supervision, training or action;
(7) review previous records for patterns; and
(8) record outcomes and follow-up. Do not delay referral or protective action while completing paperwork.

What school and college staff should do if they have a safeguarding concern, or an allegation is made about another staff member

520. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
521. Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with data protection laws.
522. Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one). Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
523. It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

1. **Concern or allegation received by Head Teacher**
2. **Is the concern or allegation about a current teacher, supply teacher, a volunteer or a contractor?**
3. **IF NO Non recent allegations from adults should go to the police. Non recent allegations by a child should go to LADO**
4. **IF YES Has the person possibly committed a criminal offence? Has the person behaved towards a child or children in a way that indicates he/they or she would pose a risk of harm to children? Has the person behaved or may have behaved in a way that indicates they may not be suitable to work with children?**
5. **IF YES Contact the Local Authority's Designated Officer without delay (also see list for managing allegations)**
6. **IF NO Is this person's conduct inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work: or is it otherwise not considered serious enough to consider a referral to LADO?**
7. **IF YES Steps should be taken to address unprofessional behaviour and support the individual to correct it at an early stage**

8. Low level concerns should be recorded in writing including:

Name of individual sharing the concern
Details of the concern
Context in which the concern arose
Action taken
(* If the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

9. Records must be kept confidential, held securely and comply with the Data Protection Act 2018 and UK GDPR. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment

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

11. (Records should be reviewed so that potential patterns of concerning behaviour can be identified)
If a concerning pattern of behaviour is identified and now meets the criteria for an allegation then the matter should be referred to the LADO.
The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that the policies or processes could be revised or extra CPD may be needed

7. Key reference document
Keeping Children Safe in Education 2026, particularly Part Four, Section Two (concerns or allegations that do not meet the harm threshold) and Part Four, Section One where the threshold may be met. Also refer to the Staff Code of Conduct, Child Protection Policy, Whistleblowing Policy, allegations procedure, data-protection/retention arrangements and current local-authority LADO procedures.
For further information please refer to KCSIE 2026

8. To report a concern go to:

If the concern may meet the harm threshold, do not use this form as the only response: report immediately through the allegations procedure and seek LADO advice where appropriate.
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 The Willows Primary School 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 Sarah Thursfield.

The Willows Primary School

Report of a Low Level Concern

Name and role of the staff member reporting the concern

Date/time received

Date/time and location of incident

Witnesses

Name and role of the staff member who the allegation/concern is against

Details of Concern *If information is unknown, state this rather than guessing.

Signature

Completion by Headteacher or Chair of Governors

Immediate action

Advice/referral sought

Decision and rationale

Outcome/follow-up.