

LOW-LEVEL CONCERNS POLICY

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Date Approved:	October 2026

Based on the Hampshire County Council model, adapted for use at Rucstall Primary School.

1.0 Policy statement

- 1.1 Our School recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.
- 1.2 Our school works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.
- 1.3 At Rucstall Primary School, we are committed to ensuring that all adults who work with children conduct themselves in accordance with the Staff Code of Conduct, safeguarding requirements and the values of the school. This policy sets out the procedures for reporting, recording and responding to low-level concerns

2.0 Scope

- 2.1 All employees employed at this school including:
 - Teachers
 - Support staff
 - Supply teachers
 - Volunteers
 - Governors
 - Local Authority visiting staff
 - Contractors
- 2.2 The term 'staff' throughout this policy refers to all of the above.
- 2.3 This policy also applies to agency workers and any adult working in or on behalf of the school.

3.0 Policy aims

- 3.1 To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.
- 3.2 To enable schools to identify concerning, problematic or inappropriate behaviour early.
- 3.3 To minimise the risk of abuse occurring.
- 3.4 To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.

- 3.5 To help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

4.0 Definition

- 4.1 The term 'low level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.
- 4.2 Keeping Children Safe in Education defines a low-level concern as 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 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.
- 4.3 Examples may include, but are not limited to:
- being over-friendly with children
 - having favourites
 - taking photographs of children on a personal device contrary to school policy
 - meeting with a child in an isolated area behind a closed door
 - humiliating or belittling children

5.0 Avoiding low level concerning behaviour

- 5.1 Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.
- 5.2 Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.
- 5.3 Our school ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:
- Staff Code of Conduct
 - 'Avoiding Allegations' guidance
 - Safeguarding and Child Protection policies and regular training
 - Teachers' Standards (for teaching staff)

6.0 Reporting a low level concern

- 6.1 Low level concerns about a member of staff should be reported to the DSL and/or 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.
- 6.2 Concerns should normally be reported using the school's Low-Level Concern Record Form, located on the Safeguarding Board in the PPA room.
- 6.2 Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.
- 6.4 Low-level concerns relating to agency staff, contractors or other third-party organisations will be shared with the relevant employer where appropriate in order that any wider patterns of behaviour may be identified.

7.0 Dealing with a low level concern

- 7.1 Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Headteacher.
- 7.2 The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes.
- 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 usual child protection investigation process.
- 7.3 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.
- 7.4 Staff are encouraged to self-refer where they believe their actions may have been misinterpreted or may have fallen below the expected professional standards.

8.0 Recording a low level concern

- 8.1 All low level concerns should be formally recorded by a member of staff when they are made aware of them. This record should then be passed to the Headteacher (or Chair of Governors if the concern is about the Headteacher).
- 8.2 The record should include:
- Details of the concern,
 - The context in which the concern arose,
 - The outcome of the investigation and any action taken, and
 - The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).
- 8.3 Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles and should be retained on the employee's personnel file in accordance with the school retention schedule. Please refer to the Headteacher to obtain a copy of your School's retention schedule if required.
- 8.4 Low-level concerns and associated records will be stored securely within the school's safeguarding recording system and managed in accordance with data protection legislation and the school's GDPR procedures.
- 8.5 Access to records will be restricted to those with a legitimate safeguarding responsibility.

9.0 Reviewing a low level concern

- 9.1 Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- 9.2 Where a pattern of such behaviour is identified, the Headteacher 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).

- 9.3 The school will take advice, where appropriate, from their HR provider in respect of low level concerns.
- 9.4 The school will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.
- 9.5 Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles and should be retained on the employee's personnel file in accordance with the school retention schedule. Please refer to the Headteacher to obtain a copy of your School's retention schedule if required.
- 9.6 Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance). Low level concerns which relate solely to safeguarding will not be included in a reference, subject to paragraph 9.7.
- 9.7 A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.
- 9.8 When a member of staff leaves the school, records of low-level concerns will be reviewed to determine whether they should be retained in line with safeguarding requirements, data protection legislation and the school's retention arrangements.

10.0 Related guidance

- 10.1 The policy links to the following guidance documents:
- Keeping Children Safe in Education (DfE)
 - Staff Code of Conduct
 - Avoiding Allegation guidance (Manual of Personnel Practice)
 - Safeguarding Policy
 - Child Protection Policy
 - Low-Level Concern Record Form

Employees of non-Hampshire County Council bodies are excluded from this policy and should refer to their own employer's policies and procedures.