Low Level Concerns Policy

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This policy is for Bury Grammar School

Principles

Bury Grammar School ('**BGS**') understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand the importance of a positive culture where concerns can be identified and spoken about openly and acknowledge that this is a key element of a strong safeguarding system. While a concern may be low-level, that concern can escalate over time to become much more serious.

The School recognises that low-level concerns form an important part of a strong safeguarding culture. Prompt identification, recording and appropriate management of such concerns supports early intervention, promotes professional accountability and helps identify patterns of behaviour before harm occurs.

The School prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The School has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children and to create a safer culture for all staff, pupils and visitors.

Behaviour which is not consistent with the standards and values of the School and which does not meet the organisational expectations encapsulated in the Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

All staff need to be informed about and be able to identify inappropriate, problematic or concerning behaviour and understand the importance of sharing concerns when they observe behaviour which violates the Staff Code of Conduct.

Scope and references

This Policy sets out good practice and provides guidance on how to deal with situations and put safeguards in place where a low-level concern may be encountered to ensure promoting of a safe culture and preventing possible harm.

The purpose of this Policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2026) 'Keeping Children Safe in Education 2026'
- DfE (2026) 'Working Together to Safeguard Children'
- DfE (2026) Guidance for Safer Working Practice for Adults who Work with Children and Young People

This Policy operates in conjunction (as appropriate) with the following :

- Staff Code of Conduct
- Safeguarding Policy
- Disciplinary Procedure
- Capability Procedure
- Whistleblowing Policy
- Data Protection Policy

What are the aims of the Low-Level Concerns Policy?

The aims of this Policy are to:

- Ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;

- Empower staff to share any low-level concerns with the Designated Safeguarding Lead ("DSL"), Principal or other nominated person and to help all staff to interpret the sharing of such concerns as a neutral act;

- Address unprofessional behaviour and support the individual to correct it at an early stage;

- Identify inappropriate, problematic or concerning behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer ("LADO");

- Provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and

- Help identify any weaknesses in the School's safeguarding system.

Distinction between an allegation that meets the harm threshold and a low-level concern

A culture encouraging reporting of Low-Level Concerns enables staff to share any concerns they may have, no matter how small, about their own or their colleagues' behaviour.

Concerns should not be limited to Safeguarding but could relate to behaviour which does not meet the professional standards expected within BGS.

Low-level concerns are differentiated from concerns or allegations that meet the harm threshold. The harm threshold is the point at which a concern or allegation is no longer low-level . The harm threshold is defined as concerns or allegations that an adult has:

- Behaved 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 in a way that indicates they may pose a risk of harm to children.

- Behaved in a way or may have behaved in a way that indicates they may not be suitable to work with children.

An **allegation that meets the harm threshold** can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- Have, as a parent or carer, become subject to child protection procedures;
- Are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

While **low-level concerns** are less serious than concerns or allegations which meet the harm threshold, the School understands that many serious safeguarding concerns often begin with low-level concerns, e.g. being overly friendly with children. The School will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

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 a 'nagging doubt' that suggests 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- relates to their conduct inside or 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.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL 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 pupils.

Staff should also be made aware that concerns may arise from behaviour outside of school, including online or personal conduct that could impact their suitability to work with children.

Staff should exercise professional curiosity when considering low-level concerns and avoid making assumptions about behaviour. Where there is uncertainty, advice should be sought promptly from the DSL or Principal so that behaviour can be considered within its wider safeguarding context.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, if it is in fact serious enough to consider a referral to the LADO, or meets the harm threshold. Once staff share what they believe to be a low-level concern, that determination should be made by the DSL.

The School will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the School, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the DSL, Principal or other nominated person immediately.

Staff are encouraged to self-refer where they believe they may have acted in a way that could be misinterpreted. Early self-reporting enables swift support and reduces the risk of misunderstanding or escalation.

This policy specifically relates to concerns or allegations that do not meet the harm threshold (low-level concerns) as set out in Part Four of Keeping Children Safe in Education (2026). Any concern that may meet the harm threshold will be managed in accordance with the School's Allegations Against Staff Procedures and referred to the Local Authority Designated Officer (LADO), where appropriate.

Roles and responsibilities

The governors will be responsible for:

- Ensuring that the School complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Principal will be responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the harm threshold, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the School, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The DSL will be responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meets the harm threshold or whether they are low-level concerns.
- Following all procedures outlined in this policy for acting upon low-level concerns.
- Liaising with the headteacher, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and keeping records of decisions made regarding safeguarding concerns, including the rationale for those decisions.

Staff will be responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately.

Appropriate and inappropriate behaviour

- The School will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.
- Staff will ensure that they pay due regard to the fact that:

        - They are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils.
        - There is a significant power imbalance in the pupil-staff dynamic.
        - There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.
- Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the School, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported immediately.
- Staff will be aware that some of the examples of low-level concerns listed above may meet the harm threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages. In addition, some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.
- Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Principal will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

School culture

The School understands that spotting the early signs of inappropriate, problematic or concerning behaviour towards children can be difficult, and staff may be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc and as such a culture of openness and transparency is key.

The School fosters a culture in which all staff feel confident to raise concerns, including low-level ones, without fear of judgment or reprisal. Concerns can be raised directly, anonymously, or informally with the DSL or Principal. A strong culture of openness is essential to prevent harm and protect pupils and staff alike.

The School will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand, and adhere to the Staff Code of Conduct.

Staff will address any questions they have regarding safeguarding to the DSL. The School will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the School community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The School will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The School will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

Any concerns or issues relating to the Low-Level Concern Policy will be included in the safeguarding reports to the Governing body.

Evaluating school culture following concerns

The School will ensure that appropriate consideration is given to the School's culture and whether it may have enabled the inappropriate behaviour. The Principal and DSL will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the School's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

Importance of sharing low-level concerns

It is necessary to ensure a culture of openness and trust is fostered within the School in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

To minimise the risk of abuse occurring, there needs to be a culture which enables staff to have the confidence to speak out. This requires a robust framework, policy, training, support and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.

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

Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the expected professional standards set out in the Staff Code of Conduct.

Staff in these circumstances should, wherever possible, proactively self-report. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- It is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- Crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The School will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Principal and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Reporting concerns

The School will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Principal, Deputy Principal or DSL immediately in line with the procedures laid out in the Safeguarding Policy. Staff members will report concerns without undue delay. Staff members will be aware that concerns are still worth reporting even if they do not seem serious. In addition, staff may complete the Low-Level Concern Reporting Form to support their report in writing. (Appendix B)

This form is designed to help record concerns clearly and consistently and to support the DSL and Principal in assessing and managing individual and/or repeated behaviours appropriately.

Where the DSL is informed of low-level concerns, they will inform the Principal in a timely fashion according to the nature of the concerns. The Principal will be the ultimate decision maker in respect of all low-level concerns; however, they may take a more collaborative approach with the DSL to make a decision.

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. However, staff members may request anonymity when reporting a concern, and the School will endeavour to respect this as far as possible. The School will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Principal, it should be reported to the Chair of Governors.

If there is a conflict of interest in sharing a low-level concern with the Principal, the low-level concern should be shared with the Chair of Governors unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the School, staff will also be required to report this to the Principal, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the Principal will be recorded.

If the School receives an allegation of a low-level safeguarding concern regarding an organisation that has hired the School premises, the School will follow its usual safeguarding procedures and process for managing allegations.

Evaluating concerns

Where the Principal is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Principal will discuss the concern with the DSL and the deputy Principal, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the Principal will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the Principal and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the behavior constitutes a low level concern;
- Determine if, in and of itself, the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Determine if the concern, when considered alongside any other low-level concerns previously made about the same individual, may meet the harm threshold and should be referred to the LADO/ other relevant agencies and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow. Where appropriate, the Principal and DSL will also consider whether concerns identify wider safeguarding issues affecting children which may require Family Help, Early Help or other multi-agency intervention.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, their determination, the rationale for their decision and any actions or decisions taken.
- Consider whether the concern or allegation also potentially raises misconduct or capability issues – taking advice from HR on a named or no-names basis where necessary – and, if so, refer the matter to HR**.**

Acting on Concerns

Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct the Principal will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Principal will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Principal will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

All responses to low-level concerns will be proportionate, fair, timely and safeguarding-led, recognising that the primary purpose of this process is to protect children, support staff to maintain professional standards and promote a culture of continuous learning.

The Principal will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the School's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and Principal will work together to resolve this with input from other staff members, as necessary.

If a concern has been raised via a third party, the Principal will collect as much evidence as possible by speaking:

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

Where the concern is low level

Where the Principal determines that a concern is low-level, the School will respond to this in a sensitive and proportionate manner. Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

- The DSL will hold a meeting with the individual about whom the concern was reported, during which they will:

  - Talk to the individual in a non-accusatory and sympathetic manner.
  - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
  - Clearly state what about their behaviour was inappropriate and problematic.
  - Discuss the reasons for the behaviour with the individual.
  - Inform the individual clearly what about their behaviour needs to change.

- Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
- Allow the individual the opportunity to respond to the concern in their own words.

- The DSL will ask the individual to re-read the Staff Code of Conduct and may offer further training opportunities, depending on the nature of the concern.
- Where considered appropriate in the circumstances, the Principal and DSL will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The Principal will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Data Protection Policy. The Principal will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis

Some low-level concerns may also raise issues of misconduct or poor performance which are unrelated to safeguarding. The Principal will also consider whether this is the case – by referring to the School's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary.

If the Principal considers that the School's disciplinary or capability procedure may be triggered, they will refer the matter to HR. If HR advise that the School's disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

Staff should be aware that when they share what they believe to be a low-level concern, the Principal will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may need to be referenced in any subsequent disciplinary proceedings.

How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee or worker to whom the School's disciplinary and/or capability procedure would apply; or a contractor, Governor, Trustee, Director or volunteer. The School's response will be tailored accordingly.

Where the concern is serious

The Principal may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same

individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation that may meet the harm threshold. The matter will be referred to the LADO/other relevant external agencies and dealt with in accordance with the School's Allegations of Abuse Against Staff Policy, Part 4 of KCSIE 2026 and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

Data Protection and Confidentiality

The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing this Policy and in keeping records of low-level concerns secure.

The Data Protection Act 2018 makes specific provision for the processing of personal data necessary for safeguarding children from harm. The Information Sharing Code of Practice (Information Commissioner's Office 2019) specifically cites safeguarding of children as a 'clear example of a compelling reason' to share personal data. Where a concern is low-level, rather than an allegation, the balance between safeguarding interest and personal data rights will be considered carefully to ensure it is a reasonably necessary measure that the data should be shared.

A proportionate approach must be taken by all to considering what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms.

If a member of staff who raises a low-level concern does not wish to be named, then the School will respect their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived (as explained further earlier in this policy).

All staff may, under data protection law, ask to see the content of any low-level concern(s) retained by the School under the Low-Level Concerns Policy as it relates to them personally, and may make any reasonable objection as to the fairness or accuracy of that content. The School will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns Policy). If the content of a low-level concern is disputed, it may not be appropriate for the School to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).

Record keeping/ reviewing low level concerns

The School will retain all records of low-level concerns, including those that were found to be unfounded. All low-level concerns will be recorded in a secure, central Low-Level Concerns Log maintained by the DSL or Principal. Where concerns are reported verbally, the DSL or Principal will ensure the concern is logged using the standard reporting form.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.

- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.
- The rationale for decisions made regarding any concerns.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. These reviews will take place at least termly and will be documented. Monitoring will also consider whether concerns indicate any disproportionate patterns relating to particular staff groups, locations, activities or safeguarding themes. Findings will inform safeguarding training, policy review and wider organisational learning.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Principal to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harm threshold, this will be referred to the LADO as soon as practicable. It should be considered whether there are any wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation that meets the harm threshold, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harm threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

There is no statutory timeframe for the retention and secure disposal of low-level concern records. In line with the Data Protection Policy, records will be kept confidentially and held securely to comply with the Data Protection Act 2018 and the UK GDPR. The School will consider how long information needs to be retained; however, it will be retained at least until the individual leaves the School.

When providing employment references, the School will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated low-level safeguarding concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not normally be included in any reference.

The Principal will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

Role of the Governors

The DSL will include in the reports to the Governors, information about the implementation of the Low-Level Concern Policy and any evidence as to its effectiveness, with any relevant data.

The Safeguarding Governor will review an anonymized sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately. The Governing Body will seek assurance that the School maintains an open safeguarding culture in which staff are confident to report concerns, that reporting systems remain effective, and that learning from low-level concerns informs policy, training and safer working practices

Monitoring and review

This policy will be reviewed annually, or sooner where there are significant changes to safeguarding legislation, statutory guidance (including Keeping Children Safe in Education or Working Together to Safeguard Children), or following learning arising from safeguarding practice, inspections or serious incidents.

Appendix A

This flowchart provides a quick-reference guide for staff to follow when they observe or experience a low-level safeguarding concern. It complements the full policy and is designed to support a transparent and open reporting culture.

1. You observe something odd or have a “nagging doubt”

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2. Report to DSL or Principal (even if unsure)

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3. DSL logs concern → reviews whether it meets harm threshold

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4. DSL decides next steps (record, speak to staff, train, escalate)

Appendix B: Low-Level Concern Reporting Form

Staff must report any low-level concerns **directly to the DSL or Principal** as soon as possible, in line with school safeguarding procedures and this policy. **In addition**, staff may complete the Low-Level Concern Reporting Form to support their report in writing if they choose to.

This form is designed to help record concerns clearly and consistently and to support the DSL and Principal in assessing and managing individual and/or repeated behaviours appropriately.

The form can be:

- Completed **digitally via the staff intranet**
- **Printed and filled out manually**
- Used as a **prompt to support a verbal report**

The form includes the following fields:

- Date and time of the concern
- Name of the individual reporting (can be anonymous)
- Name of the person the concern is about
- Description of the behaviour or incident
- Context and any witnesses
- Actions taken, if any
- DSL/Principal follow-up, outcome, and rationale for decisions

A blank version of this form is attached below:

Where concerns are reported verbally, the DSL or Principal will ensure the concern is documented appropriately using the form.

Low-Level Concern Reporting Form (To be used if helpful for staff)

This form is to be used by staff to report any low-level concern about the behaviour of an adult in school. A low-level concern is any concern – no matter how small, or even if no more than 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.

Date of report:
Name of person reporting the concern (can be left blank for anonymous reporting):
Role/Position:
Name of person the concern is about:
Date and time the incident/concern occurred (if known):
Location where the concern occurred:
Describe the concern (include as much detail as possible, including behaviour observed, words used, tone, context, etc.):
Any witnesses to the concern (if applicable):
Context or other relevant background information:
Has this concern been raised before? If so, when and with whom?

Immediate actions taken (if any):
DSL/Principal follow-up section (to be completed by DSL or Principal):
Summary of action taken:
Outcome of concern:
Rationale for decision made:
Date of DSL review:

Appendix C

Low Level Concerns Policy Issues and Updates

Date	Policy version	Summary of key change(s)
23/08/23	1	New version of policy written to offer more specific guidance to school procedures regarding Low Level Concerns and record keeping.
01/09/24	2	Update to scope and references, inclusion or roles and responsibilities and record keeping
01/09/25	3	Updated all legal references to reflect *Keeping Children Safe in Education (KCSIE) 2025* Clarified the distinction between low-level concerns and those that meet the *harm threshold*, in line with KCSIE 2025 (Part 4: Two Strands). Reinforced that staff must report concerns directly to the DSL or Principal, while also allowing staff to use the reporting form (available in print and on the staff intranet) as an additional or supporting method. Introduced Appendix B – a visual flowchart to help staff understand the low-level concern reporting process at a glance. Added Appendix B – a Low-Level Concern Reporting Form, now available on the staff intranet Clarified that all low-level concerns will be recorded in a central log, reviewed termly by the DSL and Principal, and evaluated for patterns or repeated behaviours. Included reference to anonymous reporting and reinforced secure, confidential record-keeping in line with UK GDPR and DPA 2018. Strengthened the section on school culture to highlight the importance of openness, transparency, and encouraging staff to report concerns without fear of judgment.
26/01/26	4	Policy updated throughout including clarifying the aim of the policy, expanding the reasons why staff should self-report, updates to how the DSL and principal will evaluate concerns, updates to how low level concerns are responded to including where disciplinary or capability procedures may be triggered, clarification that matters that may meet the harm threshold will be referred to the LADO/other relevant external agencies, new section on data protection and confidentiality

September 2026	5	Updated to reflect Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). Strengthened safeguarding culture through enhanced professional curiosity, organisational learning, monitoring of emerging patterns, Family Help terminology, governance oversight and alignment with the Staff Code of Conduct and Safeguarding Policy.