



Low-level concerns Policy

Audience	Teachers, support staff, supply teachers, Volunteers, LA visiting staff & Contractors
Co-ordinated by	Mrs Glover
Date written / reviewed	July 2025
Date of next review	July 2028
To be reviewed by	Head teacher
Associated Governing Body Committee	Finance Committee

School vision statement

To provide an inclusive learning community where every child matters.

Aims and Expectations

Our school aims to embed the principles of BRICKS:

- Belonging
- Respect
- Independence
- Curiosity
- Kindness
- Success

School aims

- *To provide a high standard of education in a stimulating, varied environment in which children can learn effectively;*
- *To create a caring atmosphere in which children are taught good citizenship, are happy and encouraged to act independently and foster self discipline;*
- *To encourage the children to co-operate with, understand and care for others from all backgrounds and abilities, thus children are guided into responsibility not only for their own development but also that of the whole school family;*
- *To ensure that every child, whatever their ability, has the right and opportunity to attend our school with appropriate resources and support wherever possible, and to have access to a broad and balanced curriculum;*
- *To create, maintain and develop a physical and emotional atmosphere where children are stimulated to develop powers of observation and lively enquiring minds;*
- *To develop an understanding of decision-making and the need for rules, maintaining a continuous effort to improve standards for the general good and success of all.*

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Introduction

At Greswold 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.

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 DSL/Headteacher about their concern. If the DSL/Headteacher cannot be contacted, the Chair of Governors should be contacted instead.

Keeping Children Safe in Education September 2022

Governing bodies and proprietors should have policies and processes to deal with any concerns (including allegations) which do not meet the harm threshold, referred to in this policy as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Low-level concerns

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

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

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:

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- 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.

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.

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.

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.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children 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 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 acted in a manner which:

- is not consistent with the school'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 school's Code of Conduct, and the law.

Reporting a low-level concern

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.

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Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

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).

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.

Dealing with a low-level concern

Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the DSL/Headteacher.

The DSL/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.

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.

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.

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.