Low Level Concerns Policy

This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" produced by the Safer Recruitment Consortium (2022) are lived, monitored, and reinforced.

The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" 2026

Definition of a low-level concern
A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (2022) including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and 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 potential false allegations or misunderstandings.

Reporting low-level concerns
Where a low-level concern has been identified, this will be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened.
Where the Headteacher is not available, the information will be reported to the Deputy Designated Safeguarding Lead (DDSL), Rachael Gadd.
Low-level concerns about the DDSL will be reported to the Headteacher and those about the Headteacher will be reported to the Chair of Governors.
Where the low-level concern has been reported to the DDSL, they will inform the Headteacher of the details as soon as possible.

Recording concerns
A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.
Where concerns are reported verbally to the Headteacher a record of the conversation will be made by the Headteacher which will be signed, timed, and dated.

Responding to low-level concerns
Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headteacher will:

- Speak to the person reporting the concern to gather all the relevant information

- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice may also need to be taken)

Where necessary, further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses

The information reported and gathered will then be reviewed to determine whether the behaviour:

i. is consistent with the 'Guidance for safer working practise for those working with children and young people in education settings' (2022): no further action will be required
ii. constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand

that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Appraisal or Capability Policies

iii. is serious enough to consult with or refer to the LADO: a referral should be made to the LADO (HCC Safeguarding Unit 01962 876364 Child protection | Children and Families | Hampshire County Council) and advice taken from HR.

Allegations procedure within the Child Protection Policy will be followed:

iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed

Records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken

Can the reporting person remain anonymous?
The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (i.e. self-report)?
It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which, on reflection, they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the "Guidance for safer working practice" (2022)
Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

Should the low-level concerns file be reviewed?
The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate

behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

References
Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

What is the role of the Governing Body?
The headteacher will regularly inform the Governing Body about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.