

Speen Church of England School



Low Level Concern Policy

Issued: September 2026

Next Review: September 2027

THEN CHRIST WILL MAKE HIS HOME IN YOUR HEARTS
AS YOU TRUST IN HIM. YOUR ROOTS WILL GROW
DOWN INTO GOD'S LOVE AND KEEP YOU STRONG.

—EPHESIANS 3:17 (NLT)

This policy is available on the school website and on request from the School. It should be read in conjunction with the

- Safeguarding & Child Protection Policy

This document also complies with:

- DfE Keeping Children Safe in Education (2026), in force from 1 September 2026

Policy Statement

‘Low-level concerns’ are allegations/concerns that do not meet the harm threshold (see Part 4 of KCSIE 2026).

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.

The School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. If implemented correctly, this should maintain the open and transparent culture; enable the Schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and 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 institution.

What is a low-level concern?

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. 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 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on a 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.

Key aims:

- to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- to empower staff to share any low-level safeguarding concerns;
- to address any unprofessional behaviour and support the individual to correct it at an early stage;
- to provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- to help identify any weakness in the School's safeguarding system.

How to report and share low-level concerns

- Staff must share low-level concerns responsibly and with the DSL (or with the Chair of Governors if the concern is about the Head).
- They will then be recorded in writing and dealt with appropriately.
- Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns will be recorded in writing directly to the DSL (forms are found in the staff room). 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.

These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the School 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.

Responding to low-level concerns

If the concern has been raised via a third party, the Head / Chair of Governors

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.

The Head should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the Head may wish to consult with the Designated Safeguarding Lead and take a more collaborative decision-making approach.

The information collected will help the Head to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

Staff can use the low-level concern form to report incidents or concerns, or they can email the Head directly. Anyone raising a concern or allegation is protected by the school's whistleblowing policy.