

Ashford CE Primary School



Low-Level Concerns Policy

Updated Policy: June 2026

Signed: L Bowman

Approved by FGB: 11 June 2026

Chair of Governors

Next review: September 2026 on changes to Keeping Children Safe in Education

Low-Level Concerns Policy

Our School Vision

We are a caring Christian community where everyone adopts an “I can” attitude; everyone feels valued, safe and loved by God. We celebrate our God-given individuality, achievements and talents and we aspire, with God’s help, to become the best that we can be. We believe that each one of us has the ability to achieve our highest potential, living and learning in the fullness of God.

I can do all things through Christ who gives me strength.

Philippians 4v13

Introduction

At Ashford CE 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.

Where “Staff” is used in this policy it also refers to Third Party Staff at the school, such as Supply Staff, Governors, Volunteers and Contractors.

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 Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, a member of the DSL should be contacted instead. In the case of a concern about the Headteacher the Chair of Governors should be contacted.

Keeping Children Safe in Education September 2025

Low-level concerns

428. 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.

429. 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:

- 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 a low-level concern is

430. 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:

- 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 children.

431. 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.

432. 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.

433. 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

Concern or allegation that may meet harm threshold

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; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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 with children may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

Appropriate conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring 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
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to Low-Level Concerns

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses where appropriate
- Seek general advice from the LADO service prior to any referral

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL team and seek general advice from the LADO.

Storing and Use of Low-Level Concerns and Follow-Up Information

Low-Level Concerns forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the leadership team. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. This will be stored in accordance with the Data Protection Act 2018 and the UK GDPR.

Records may be added to CPOMS where appropriate so that any potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, either through the disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described above, the Headteacher will refer it to the designated officer at the local authority (LADO).

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team.

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.

Whenever staff leave Ashford CE Primary School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

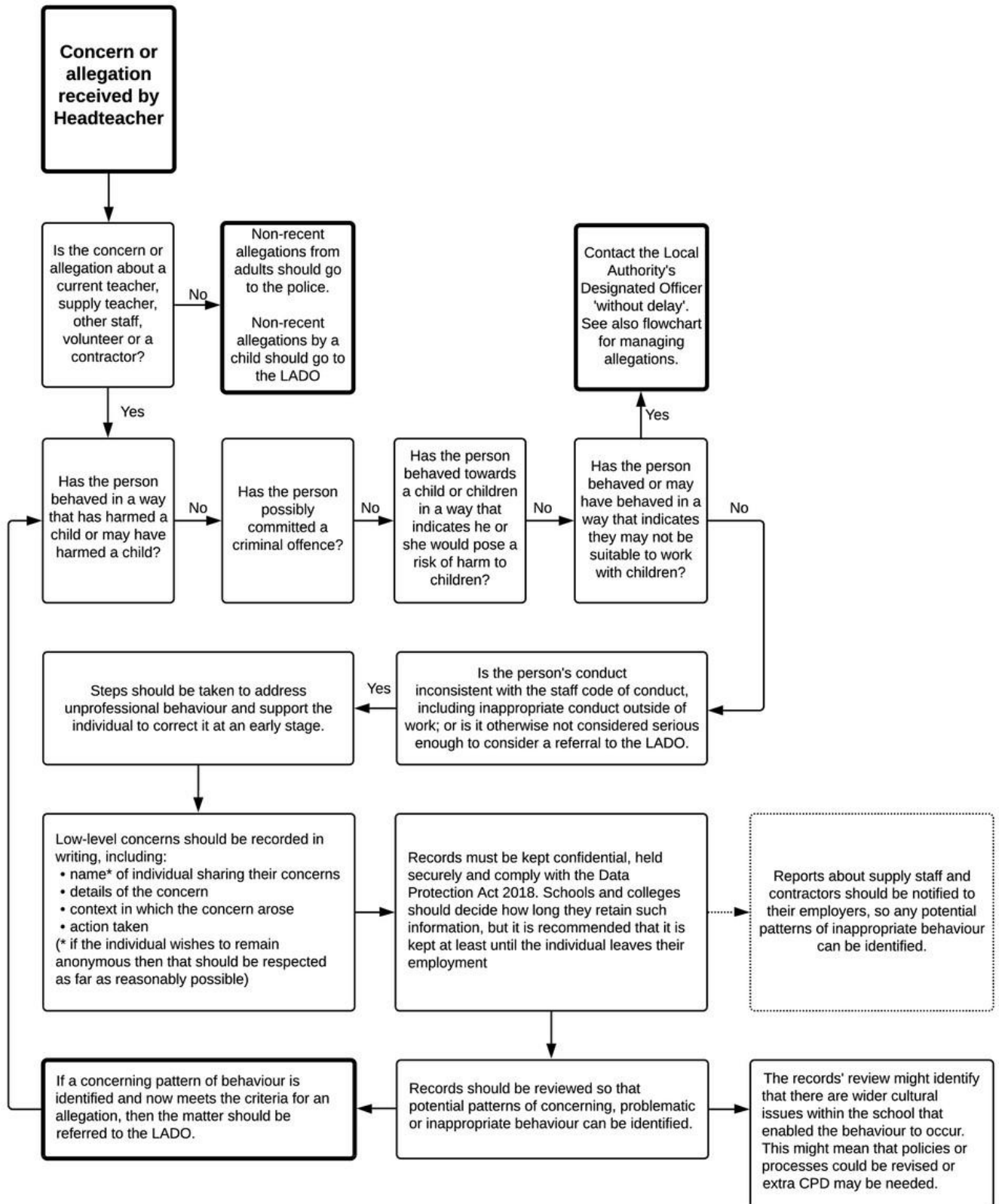
- (a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.
- (c) The Leaver's Form will record whether any information has been retained.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance

Process to follow when a Low-Level Concern is raised



Key Reference Document

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2025.

Low Level Concern Form

This form will be available to staff via:

- The Staffroom
- The Office
- DSLs
- The Senior Leadership Team
- School Business Manager / Business Office