

Romsey
PRIMARY SCHOOL AND NURSERY

Low Level Concerns Policy 2026-27

POLICY STATEMENT

Romsey Primary School & Nursery recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

Our school works to ensure that we promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately.

SCOPE

All adults at this school include:

1. Teachers
2. Support staff
3. Supply teachers
4. Governors
5. Volunteers
6. Local Authority visiting staff
7. Contractors

The term 'staff' throughout this policy refers to all of the above.

POLICY AIMS

To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.

To enable schools to identify concerning, problematic or inappropriate behaviour early.

To minimise the risk of abuse occurring.

To 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 school.

To help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

DEFINITION

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 for an allegation. 'Keeping Children Safe in Education' defines a low level concern as:

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

Low-level concerns may arise from suspicion; a complaint; a disclosure made by a child, parent or other adult within or outside the school; or information identified through vetting checks.

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

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone or other personal device contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; and
- humiliating children.

The examples above are illustrative and not exhaustive. Staff should share any concern, however small, where behaviour appears inconsistent with the Staff Code of Conduct or professional boundaries.

AVOIDING LOW LEVEL CONCERNING BEHAVIOUR

Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

Our school ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

STAFF CODE OF CONDUCT

- 'Avoiding Allegations' guidance
- Safeguarding and Child Protection policies and regular training
- Teachers' Standards (for teaching staff).

REPORTING A LOW LEVEL CONCERN

Low-level concerns about a member of staff must be shared confidentially with the Headteacher or DSL as soon as reasonably possible and in accordance with the school's Child Protection procedures. Where a concern is initially shared with the DSL, the DSL will inform the Headteacher in a timely manner according to the nature of the concern. The Headteacher is the ultimate decision-maker in respect of all low-level concerns, although the Headteacher may consult the DSL and adopt a collaborative decision-making approach. If the concern is about the Headteacher, it must be reported to the Chair of Governors. Where there is a conflict of interest in reporting the matter to the Headteacher or Chair of Governors, the concern should be reported directly to the LADO.

Low-level concerns about supply staff, contractors and local authority visiting staff will also be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

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 Headteacher (or Chair of Governors if the concern is about the Headteacher).

The 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.

If the school is in any doubt as to whether information shared as a low-level concern may meet the harm threshold, the Headteacher will consult the LADO.

Where a concern is assessed as a low-level concern, the Headteacher or nominated deputy will respond sensitively and proportionately. Where the concern has been raised by a third party, as much evidence as possible will be gathered by speaking directly to the person who raised the concern, unless it was raised anonymously; the individual involved; and any witnesses. The information collected will be used to categorise the behaviour and determine what further action is required. The rationale for the decision, the outcome and any action taken will be recorded in writing.

The school will engage with Education Personnel Services (EPS) where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

RECORDING A LOW LEVEL CONCERN

All low level concerns should be formally recorded by a member of staff when they are made aware of them. This record should then be passed to the Headteacher (or Chair of Governors if the concern is about the Headteacher).

The record should include:

1. Details of the concern.
2. The context in which the concern arose.
3. The outcome of the investigation and any action taken, and
4. 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).

Low-level concern records will be kept confidentially and securely, with access restricted to those who need it for safeguarding or employment purposes. Records will be handled in accordance with data protection law and the school's records-management arrangements. Records will be retained at least until the individual leaves their employment with the school, and longer where another applicable safeguarding, employment or legal retention requirement applies. A separate central record of low-level concerns will also be maintained to support the identification of patterns involving an individual or across the wider school culture.

REVIEWING A LOW LEVEL CONCERN

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 Headteacher (or Chair of Governors if applicable) will decide on a course of action, which may include:

1. Disciplinary investigation and/or proceedings.
2. Management Advice, including recommendations for training.
3. Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).
4. The school will take advice, where appropriate, from their HR provider in respect of low level concerns.

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.

The Headteacher will ensure that low-level concern records are reviewed periodically and whenever a new concern is received, so that potential patterns can be identified and acted upon promptly.

Low-level concerns will not be included in a reference unless they relate to issues that would normally be included, such as misconduct or poor performance. A low-level concern that relates exclusively to safeguarding, and not to misconduct or poor performance, will not be included in a reference. Concerns or allegations found to be false, unfounded, unsubstantiated or malicious will not be included.

Where a substantiated safeguarding concern or allegation, including a group or pattern of low-level concerns about the same individual, meets the harm threshold, any

reference will provide factual information in accordance with KCSIE and the school's legal and employment obligations.

RELATED GUIDANCE

This policy links to the following guidance documents (all available upon request):

1. Keeping Children Safe in Education
2. Code of Conduct
3. Avoiding Allegation guidance
4. Safeguarding Policy
5. Child Protection Policy
6. Staff Code of Conduct Policy
7. Whistleblowing Policy
8. Teachers' Standards
9. Working Together to Safeguard Children
10. UK GDPR and Data Protection Act 2018
11. DfE Staffing and Employment Guidance for Schools

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