Respect Reflection Responsibility Resilience

Green Shoots Partnership

Low Level Concern Policy 2025-2026

Meadowside Primary School

Great Doddington Primary School

Contents

1. Introduction
2. Summary
3. Keeping Children Safe in Education (KCSIE) September 2025
4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct
5. Storing and Use of Low-Level Concerns and Follow-Up Information
6. Process to Follow when a Low-Level Concern is Raised
7. Key Reference Documents
8. Low-Level Concern Form

1. Introduction

At Green Shoots Partnership, 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. It also cross-references the Whistleblowing Policy, Staff Code of Conduct, and Safeguarding/Child Protection Policy to ensure consistency across safeguarding systems.

All staff will receive training on the Low-Level Concern Policy during induction and regular refreshers to ensure awareness and understanding of their responsibilities.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is nevertheless inappropriate. A member of staff who has a concern about another member of staff should inform the Head of School about their concern using a Low-Level Record of Concern Form. If the Head of School cannot be contacted, the Executive Head Teacher or the Chair of Governors should be contacted instead.

Failure to report a low-level concern may itself be considered a safeguarding concern and could lead to disciplinary action. All staff have a duty to report any concerns promptly to maintain a safe environment for pupils.

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 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 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.

412. 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.

3. Keeping Children Safe in Education (KCSIE) September 2025

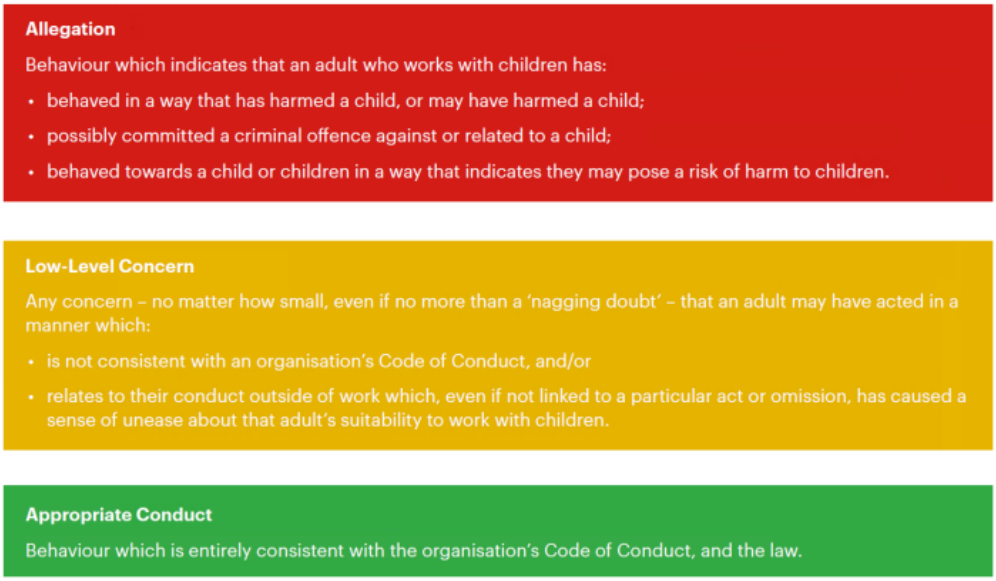
In line with Keeping Children Safe in Education (KCSIE) 2025, schools and colleges must promote an open and transparent culture where all concerns about adults are dealt with promptly and appropriately. Low-level concerns are those that do not meet the threshold of harm (as defined in KCSIE Part Four, Section One), but nevertheless may indicate concerning, problematic, or inappropriate behaviour. These must still be reported, recorded, and addressed in line with this policy.

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

• Allegation: Behaviour that meets the harm threshold (e.g., caused harm, possible criminal offence, or indicates someone may pose a risk of harm) – must be referred to the Local Authority Designated Officer (LADO).

• Low-Level Concern: Behaviour inconsistent with the Staff Code of Conduct but below the threshold for an allegation. Examples include being over-friendly with children, having favourites, taking photographs of children on a personal device, engaging in one-to-one situations in secluded areas, or using inappropriate language.

• Appropriate Conduct: Behaviour consistent with professional boundaries and the Staff Code of Conduct. No action required.



5.
Storing and Use of Low-Level Concerns and Follow-Up Information

All low-level concerns and follow-up information will be stored securely within the school's safeguarding system (MyConcern), with access restricted to the Designated Safeguarding Lead (DSL), Head of School, Executive Head Teacher, and, where appropriate, the Safeguarding Governor.

Records will be managed in line with the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Records of low-level concerns will be retained securely for a minimum of seven years after the member of staff leaves the school or until the individual reaches normal retirement age, whichever is longer, unless deletion is justified earlier following a safeguarding review.

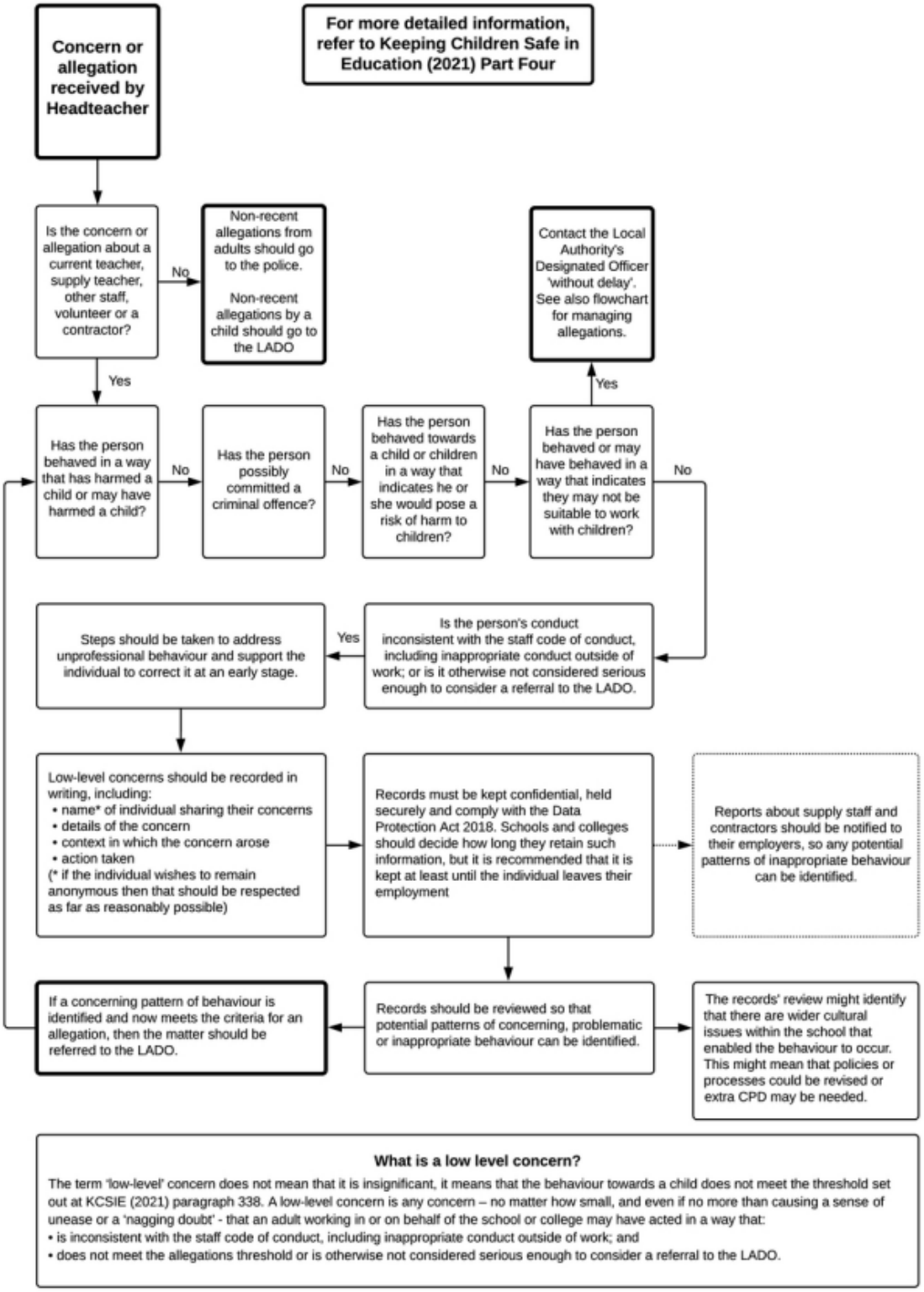
Low-Level Concerns will not be referred to in references unless they have been formalised into disciplinary or misconduct procedures. Records will be reviewed when staff leave to determine whether retention is necessary for safeguarding purposes or potential historic claims. If not, records will be securely deleted.

6. Process to Follow when a Low-Level Concern is Raised

1. Staff member identifies a low-level concern.
2. Concern is documented on the Low-Level Concern Form.
3. Form submitted to the Head of School (or Executive Head Teacher/Chair of Governors if the concern is about the Head of School).
4. Concern is logged securely by the DSL/Head of School.
5. Concern is reviewed and appropriate action taken (e.g., support, training, monitoring, or escalation).
6. Outcome and follow-up recorded in safeguarding system.
7. If threshold is met, referral is made to the LADO immediately.
8. Staff member raising the concern is updated appropriately.

Concerns should be reported as soon as reasonably possible. The designated person will acknowledge receipt within 24 hours and provide updates on the progress of the concern as appropriate. Support will be offered to staff raising concerns to ensure they feel safe and confident throughout the process.

6. Process to Follow when a Low-Level Concern is Raised



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 threshold set out at KCSIE (2021) paragraph 338. 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

7. Key Reference Documents

- Keeping Children Safe in Education (KCSIE) 2025
- Green Shoots Whistleblowing Policy
- Green Shoots Safeguarding/Child Protection Policy
- Staff Code of Conduct
- Farrer & Co Guidance on Low-Level Concerns (2021)
- Local Safeguarding Partnership Procedures

8. Low-Level Concern Form

Please use this form to share any concern – no matter how small, even if it is only a 'nagging doubt' – that an adult may have acted in a manner which:

• Is not consistent with Green Shoots Partnership's Staff Code of Conduct; and/or

• Relates to their conduct outside of work which has caused a sense of unease about their suitability to work with children.

Completed forms should be submitted to the Head of School. If the concern is about the Head of School , the form should be passed to the Executive Head Teacher or the Chair of Governors.

8. Low-Level Concern Form



Green Shoots Partnership

Low-Level Record of Concern Regarding a staff Member

Staff Member Reporting Concern: _____

Date: _____

Details of Concern (include names, dates, places):

_____

_____

_____

_____

_____

Action Taken by DSL/Head: _____

Outcome/Follow-Up: _____

Signature of Reviewing Officer: _____

Staff may choose to raise concerns anonymously; however, providing contact details helps with follow-up. All information shared will be treated confidentially and only disclosed on a need-to-know basis.