

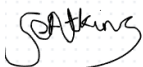


Marchwood Church of England Infant School

Low Level Concerns Policy

Headteacher: Sally Atkins

Date approved: September 2026

Signed: 

Review due: September 2027

1. Introduction

At Marchwood C of E Infant School, we understand that safeguarding is the most important part of our job. 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.

Our school 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.

2. Scope

All employees employed at this school including:

- Teachers
- Support Staff
- Supply Teachers
- Volunteers
- Local Authority visiting staff
- Contractors

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

3. 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.

What is a low level concern?

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"*
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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.

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.

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
- Teacher' standards (for teaching staff)

Reporting a low level concern

Low level concerns about a member of staff should be reported to the DSL and/or Headteacher as per the school's Child Protection procedures. If the concern is about the Headteacher this should be reported to the Chair of Governors.

Low level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

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.

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.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual child protection investigation process.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

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;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Low-Level Concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.

8.0 Recording a low level concern

8.1 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).

8.2 The record should include:

- Details of the concern
- The context in which the concern arose
- The outcome of the investigation and any action taken, and

- 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).

Storing and use of Low-Level Concerns and follow-up information

LLC forms and follow-up information will be stored securely on CPOMS StaffShare within the school's safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

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

Where a pattern of such behaviour is identified, the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

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.

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 Marchwood C of E Infants, 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.

6. Low Level Concern Form

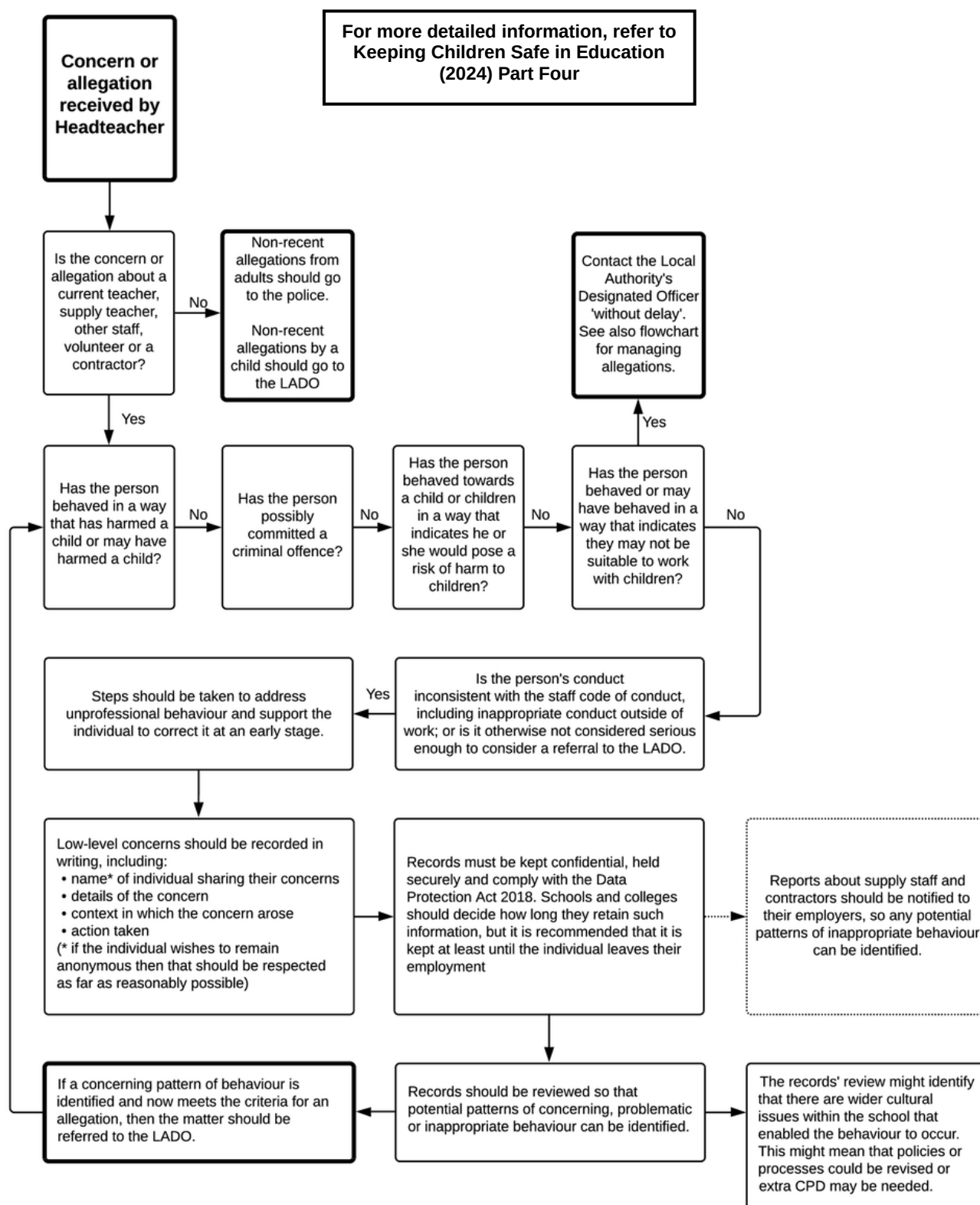
The form will be available to staff via:

Blank hard copies are stored on the wall outside the medical room.

Blank PDF electronic copies are available to be printed from Teacherpool: Safeguarding Children: Low Level Concerns Form. Please note this is a PDF and cannot be typed into as it must be printed, completed and securely handed to the Headteacher. If you are unsure or need further help, please speak to:

- The Office
- DSLs
- The Senior Leadership Team

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. 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.

Low Level Concern Form

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

- is not consistent with Marchwood C of E Infant School's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

Details of Concern

Name of staff member:	Role:
Signed:	Time and date:
Received by:	At (time): On (date):

Action taken (specify):	
Signed:	Time and date:

Related guidance

10.1 The policy links to the following guidance documents:

- Keeping Children Safe in Education (DfE)
- Model Code of Conduct (manual of Personnel Practice)
- Avoiding Allegation guidance (Manual of Personnel Practice)
- Safeguarding Policy
- Child Protection Policy