

Naunton Park Primary School

Low-Level Concern Policy

Last review date: October 2025
Next review date: September 2026

A handwritten signature in black ink, appearing to be 'J. P. ...', written over a light grey rectangular background.

Approved by Governors 14.10.25

Contents

| | | |
|---------|--|---|
| 1.0 | Introduction and aims | 3 |
| 2.0 | Low-level Concerns | 3 |
| 3.0 | Sharing Low-level Concerns | 4 |
| 3.1 | Reporting low-level concerns | 4 |
| 3.1.1 | Self-reporting | 4 |
| 3.2 | Recording low-level concerns | 5 |
| 4.0 | Responding to Low-level Concerns | 5 |
| 5.0 | Monitoring | 7 |
| Annex A | | 8 |

1.0 Introduction and aims

The aim of this policy, along with all other policies relating to the safeguarding and protection and welfare of children at Naunton Park, is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

This policy has been written in response to the information and guidance printed in Keeping Children Safe in Education, Guidance to Safer Working Practice and Working Together to Safeguarding Children. It should be read in conjunction with Gloucestershire County Council's Code of Conduct and Allegations Management Procedures as well as the school's Child Protection Policy.

This policy refers to "staff" as anyone working in or on behalf of Naunton Park Primary School in a paid or unpaid capacity. In *Keeping Children Safe in Education (KCSIE) 2025*, the term "staff" is used broadly to encompass all individuals working in a school or college setting. This includes:

- **Teaching staff**
- **Non-teaching staff**
- **Volunteers**
- **Contractors**
- **Agency workers**
- **Temporary staff**

Part Four of Keeping Children Safe in Education (2025) covers the two levels of concerns and allegations that might be made against a member of staff:

1. Concerns/allegations that may meet the harm threshold.
2. Concerns/allegations that do not meet the harm threshold – referred to for the purpose of this guidance as 'low-level concerns'.

The school's Child Protection Policy and Code of Conduct aim to negate the need for a concern to be raised by making expectations of staff behaviour clear. The aim of this policy, however, is to ensure that the school has an open and clear system in place to identify and address 'low-level concerns' raised about a member of staff if a concern arises.

At Naunton Park Primary School, we achieve these aims by:

- Ensuring all staff, including volunteers, are clear about what appropriate behaviour is;
- Ensure all staff, including volunteers, feel 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 (see below) and to self-refer;
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Responding to such concerns sensitively and proportionately when they are raised;
- Helping to identify any weakness in the school's safeguarding systems and processes.

2.0 Low-level Concerns

Part Four, Section Two of Keeping Children Safe in Education (2025) explains what the term "low-level concern" means and how such a concern should be managed.

Paragraph 433 in KCSIE (2025), states: "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 is listed in KCSIE, including (but not limited to):

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

Low-level concerns may arise through suspicion, complaint or a disclosure made by a child, parent or another adult either inside or outside of the organisation. They may also arise as a result of any vetting checks undertaken.

3.0 Sharing Low-level Concerns

Low-level concerns must be shared responsibly and recorded and dealt with appropriately. By ensuring that such concerns are dealt with effectively, those working in or on behalf of the school are also protected from becoming the subject of potential false low-level concerns or misunderstandings.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether the behaviour in question constitutes a low-level concern, or if it may meet the harm threshold. As explained below, once staff share what they believe to be a low-level concern, that determination should be made by the Headteacher and in consultation with the DSL if/as appropriate.

3.1 Reporting low-level concerns

All concerns about a member of staff must be reported to the Headteacher. If the concern is about the Headteacher, then the concern should be reported to the Chair of Governors. The Headteacher (or Chair of Governors if applicable) is referred to as the case manager throughout this policy. In the absence of the Headteacher, concerns should be reported in the first instance to the DSL or DDSL as applicable, who will then inform the Headteacher at the earliest opportunity. Low-level concerns which are shared about supply staff and contractors are notified to their employers.

All low-level concerns must be recorded in writing using the form in Appendix A. However, in the first instance, a concern may be raised/reported verbally and discussed with the case manager before it is recorded in writing.

If the concern relates to a particular incident, it must be reported within 24-hours of becoming aware of it. That said, all staff should be aware that it is never too late to share a low-level concern. If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the Headteacher, DSL or Chair of Governors (as applicable) will consult the LADO.

If an allegation is made that relates to an incident where an individual or organisation was using the school premises for running an activity for children, the school’s safeguarding policies and procedures are followed, including informing the LADO, as would be the case with any safeguarding allegation.

3.1.1 Self-reporting

If a staff member knows they are going to be in a situation which could be deemed a breach of staff code of conduct, or have (on reflection) behaved in a manner which they consider falls below the standard set out in the staff code of conduct, they should inform the Headteacher through the process outlined in this policy.

Staff should be aware that self-reporting in these circumstances can be positive: it is self-protective; it demonstrates awareness of the expected behavioural standards and self-awareness as to their own actions; and it maintains a culture where everyone aspires to the highest standards of conduct and behaviour.

3.2 Recording low-level concerns

As stated above, all low-level concerns must be recorded in writing using the form in Appendix A. If the individual reporting the concern wishes to remain anonymous, then this should be respected as far as reasonably possible, but this should never be promised and staff should be encouraged (through a reminder of this policy) to consent to be named, which will in turn help to create a culture of openness and transparency.

A record of all internal conversations and external conversations (for example with the LADO if applicable) is kept with the original Low-Level Concern Report Form. Additionally, any decision and actions taken are recorded with the rationale for this/these. If applicable, a risk assessment or improvement plan (or any other documentation resulting from the investigation/initial concern) is recorded and kept with the original Low-Level Concern Report Form and all other documentation relating to this.

Records are:

- Kept securely in the personnel filing cabinet and are held in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- Reviewed so that 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 school's disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in KCSiE, the Headteacher will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer or agency, so any potential patterns of inappropriate behaviour can be identified.

Low-level concerns are not included in a reference for employment 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 or the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

4.0 Responding to Low-level Concerns

If the Headteacher (or Chair of Governors) is in any doubt as to whether a concern meets the harm threshold, the Local Authority Designated Officer (LADO) will be contacted in the first instance.

Low-level concerns shared about supply staff, contractors or any other professional are notified to their employer by the Headteacher or DSL. This includes professionals using the premises for running a school-based activity for children.

All concerns are managed and actioned in a timely manner to safeguard children. Allegations are managed fairly, consistently and through a process that provides effective child protection while also supporting the individual who is the subject of the allegation.

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.

The case manager will use the information collected to categorise the type of behaviour and determine any further action, in line with the GCC's Code of Conduct. The case manager will determine whether the concern:

- Meets the harm threshold;
- Constitutes a low-level concern;
- Is determined that the behaviour is consistent with the staff Code of Conduct.

If it is determined that the behaviour is consistent with GCC's Code of Conduct and all other safeguarding policies (as applicable) and the law, the case manager will:

- update the individual concerned;
- update the person who shared the low-level concern, providing feedback about how and why the behaviour is consistent with the code of conduct and law;
- record the findings and final decision on the original Low-Level Concern Report Form and any actions taken (including any meeting/informal discussion with the adult concerned and the person who shared the concern);
- consult the DSL/Chair of Governors/professionals at GCC if the staff Code of Conduct is not clear and update school policy if there is any information that is unclear or the policy(s) contain ambiguous statements.

Where the concern does not meet the harm threshold, but does constitute a low-level concern:

- any investigation and further meetings/discussions are carried out discreetly and on a need-to-know basis;
- the person named must understand how their behaviour is concerning, problematic or inappropriate, what change is required and what the consequences will be if they fail to reach the required standard or if the behaviour is repeated;
- the case manager will direct support, if necessary, to the staff member that the concern is about in the form of, for example, a conversation and verbal advice, review of the Code of Conduct and relating policies, creation and reviews of an informal improvement plan and/or creation and reviews of a risk assessment;
- the case manager will direct support to the pupil(s) named on the Low-Level Concern Report Form and/or through investigation;
- the case manager will ensure (and agree with the staff member concerned) that regular monitoring is in place;
- it may be deemed that, by the very nature of the concern being "low-level", no further action is required.

The case manager should consider whether the low-level concern raises issues of misconduct or poor performance that are unrelated to safeguarding. If this is the case, advice should be sought from HR. Where low-level concerns do trigger the disciplinary, capability, grievance, whistleblowing or other procedures, these procedures should be followed where appropriate. Where low-level concerns are raised which engage other procedures, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. The case manager should exercise their professional judgement and, if in any doubt, they should seek advice from HR and other relevant external agencies including the LADO.

How the school responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern. The response of the school should be tailored accordingly and the case manager may wish to see specialist advice.

At all points through the process, the individual must have the opportunity to respond to any factual allegations.

If it is determined that the behaviour in itself may meet the harm threshold, or, when considered with any other low-level concerns that have previously been shared about the same individual, may meet the harm threshold:

- it should be referred to the LADO/ other relevant external agencies, and in accordance with the school's Child Protection Policy or, if separate, managing allegations against staff policy, and Part 4 of KCSIE;
- the school will comply – in all matters relating to safeguarding – with the relevant procedures and practice guidance stipulated by GCC.

The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL (except if the concern is about the Headteacher, in which case the Chair of Governors will hold the responsibility of ultimate decision maker).

5.0 Monitoring

All staff and volunteers, upon appointment and before starting in post (or within the first seven days in post), receive a safeguarding induction, which includes (but is not limited to) a copy and discussion of:

- This Low-Level Concerns Policy;
- GCC's Code of Conduct;
- School's Child Protection Policy;
- School's Online Safety Policy (including Acceptable Use);
- Safer Working Practice;
- Working Together to Safeguard Children;
- Keeping Children Safe in Education.

All staff also have access to information about Allegations Management procedures.

Annually, all staff (including governors) are asked to read and receive an update about the above policies and procedures, which includes an update and training, as needed, about low-level concerns.

This policy is reviewed annually alongside the school's Child Protection Policy. The Governing Body must be equipped with the knowledge to provide strategic challenge to test and assure itself that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. The Governing Body should be kept up to date, by the Headteacher, about the implementation of the Low-Level Concerns Policy and any evidence as to its effectiveness.

Annex A

Low-Level Concern Report Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with GCC’s Code of Conduct, including inappropriate conduct outside of work;
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

You should provide a concise record using this form, including brief context in which the low-level concern arose, and details which are chronological, are precise and as accurate as possible, about any such concern and relevant incident(s). Please use a separate sheet if necessary. The record should be signed, timed and dated. Please give this form to the Headteacher (or the Chair of Governors if your concern is about the Headteacher).

| | | | |
|--|--|----------------------------------|--|
| Name of staff member reporting concern: | | Role: | |
| Name of staff member that the concern is about: | | Role: | |
| Date of form completion: | | Signature: | |
| Detail of concern (include names, dates, times, locations as applicable): | | | |
| | | | |
| Name of person receiving form: | | Date & time received: | |
| Signature of person receiving form: | | | |
| Action taken: | | | |

This form will be held securely in accordance with the Low-Level Concerns Policy. Please note that low-level concerns will be treated in confidence as far as possible, but Naunton Park Primary School may be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations