



# The Children's House

## Low Level Concerns Policy

This policy should be reviewed annually and as required by legislation.		
Action	Reviewer	Date
Review	MZ	September 2025
Approved by COM	SP	September 2025
Date for next internal review		July 2026

## Low Level Concerns Policy

Low level concerns (including allegations) are those that do not meet the harm threshold set out in the Child Protection and Safeguarding policy<sup>1</sup>. Concerns may arise from suspicions, complaints, a disclosure made by a child, parent or other adult or member of the public or as a result of vetting checks undertaken. The Children's House will manage and record such concerns and take appropriate action to safeguard children.

The Children's House, as part of our whole school approach to safeguarding, promotes an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We believe it is critical to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four KCSIE 2025) are shared responsibly and with the right person, recorded and dealt with appropriately. This is to ensure that problematic or inappropriate behaviour is identified early, the risk of abuse is minimised and that all adults working in the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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

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- <sup>1</sup> 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 he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children (eg where they are involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children, one example being domestic abuse.)

- 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

### **Definition of a Low-Level Concern**

A low-level concern means that the behaviour towards a child does **not meet** the threshold set out at Section 1 of KCSIE 2025. 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 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.

The school believes it is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. This will also protect staff from potential false allegations or misunderstandings.

The school's Low-level concerns policy is also set out within the Staff code of conduct.

### **What to do if you have a low-level concern**

- Low-level concerns about a member of staff should be reported to the Head teacher. Where a low-level concern is raised about the head teacher, it should be shared with the Chair of the Council of Management.
- The school encourages staff to feel confident 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.
- Where a low-level concern relates to a person employed by a supply agency or a contractor, that concern should be shared with the DSL and/or headteacher and recorded in accordance with the school's low-level concern/staff code of conduct policy and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### **Response to a Concern**

If the concern is raised via a third party, the DSL/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 DSL/Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Staff Code of Conduct Policy.

### **Recording low-level concerns**

- All low-level concerns should be recorded in writing by the DSL. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (KCSIE 2025 Part Two).
- 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 school will either implement disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, it will be referred to the LADO.

- Consideration will also be given to whether there are wider cultural issues within the school that have enabled the behaviour to occur and where appropriate policies will be reviewed and updated or extra training delivered to minimise the risk of it happening again. The records will be retained at least until the individual leaves the employment of the school, unless there is an ongoing investigation taking place.

## **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 which would ordinarily be included in a reference, such as misconduct or poor performance

This Policy was reviewed, amended and agreed by the Council of Management in September 2025. It will be reviewed again in one year's time.

Signed: Sarah Pitcher, Council of Management Member with Safeguarding Responsibility