

Stoke Park Infant School

Low Level Concerns Policy 2026-2027



Approved by	FGB
Reviewed date	April 2026
Next review date	Spring 2027
Responsible person	Headteacher
Committee responsible	FGB
Regularity of review	Annual

Low Level Concerns Policy 2026-2027

This policy needs to be read in conjunction with the following policies:

- Child Protection Policy
- Safeguarding Policy
- Procedure for Protected Disclosures (Whistleblowing)
- Code of Conduct
- KCSiE

Rationale

At Stoke Park Infant School, we put the welfare and safeguarding of all our pupils at the forefront of all we do. We believe that all those who work with children must always behave appropriately and that early identification and prompt and effective management of concerns regarding adults is crucial to effective safeguarding. The purpose of our low-level concerns policy is to ensure that we create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our code of conduct are lived and monitored. This policy, alongside the culture of our school, will support staff to be able to raise any concerns no matter how small.

This policy sits alongside our child protection policy, safeguarding policy and our code of conduct. We have referred to *Keeping Children Safe in Education 2021* and *Developing and implementing a low-level concerns policy: A guide for organisations which work with children* (Farrer and co). <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

Scope of the policy

This policy applies to **ALL** adults who may come into contact with pupils at Stoke Park Infant School including:

- all members of staff, including leadership, teaching and support staff;
- volunteers, including governors;
- casual workers;
- temporary and supply staff, either from agencies or engaged directly;
- student placements, including those undertaking initial teacher training, and apprentices.

What is a low-level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold for a referral as set out in section 4 of *Keeping Children Safe in Education 2021*. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Examples may include:

- 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;
- using inappropriate sexualised, intimidating or offensive language

Staff do not need to be able to determine in each case whether their concern is a low- level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low- level concern, that determination should be made by the Headteacher.

If there is any doubt about the level at which behaviour needs to be addressed, LADO advice will be taken by the Headteacher.

Sharing concerns

If a member of staff has a concern, then they will need to be passed onto the Headteacher (DSL) within 24 hours. In her absence, she can be contacted via telephone. Should this not be possible then concerns must be passed the Deputy Headteacher. They will then inform the Headteacher as soon as possible.

If the concern is regarding the behaviour of the Headteacher, then staff will need to contact the Chair of Governors.

If a concern relates to a contractor or supply teacher, the school will pass on the concern to their employer.

Self- referring

Occasionally, a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct.

Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest

standards of conduct and behaviour. Staff can speak to the Headteacher if they feel they need to self-refer.

Reporting concerns

Staff can speak verbally to the Headteacher but must then follow up in writing a summary of their concerns which should be signed and dated. The Headteacher must also write up a record of any conversation and sign/date it.

What should be included in a record?

- Name and role of the person recording the concern
- Date, time and signature
- Context in which the concern arose
- Accurate and concise details which should if appropriate be chronological

All records will be stored in a locked cabinet in the Headteacher's office and retained for at least as long as the individual remains in our school.

Dealing with concerns

Once the concern has been received, the Headteacher (or Chair of Governors if the concern relates to the Headteacher) will:

1. Speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary has yet been provided.
2. Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
3. Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
4. Review the information and determine whether the behaviour:
 - is entirely consistent with their staff code of conduct
 - constitutes a low-level concern.
 - is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary.
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/ other relevant external agencies.
 - in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies.
5. Where they are in any doubt whatsoever, seek advice from the LADO - on a no-names basis if necessary;
6. Make appropriate records of:
 - all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);

- all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);
- their determination
- the rationale for their decision
- any action taken.

Any investigation of low-level concerns will be conducted discreetly and, on a need-to-know basis.

If it is determined that the reported behaviour is consistent with expected behaviour in the school code of conduct, then the Headteacher will inform the individuals concerned as soon as possible. No further action will be taken.

Further action

If it is determined that the behaviour constitutes as low-level concern most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action.

Most will be resolved through a conversation with the individual. Any such conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

Some low-level concerns may also raise issues of misconduct or poor performance. The Headteacher should also consider whether this is the case – by referring to disciplinary and/or capability procedures and taking advice from the LADO on a named or no-names basis where necessary. If the Headteacher considers that the organisations disciplinary or capability procedure may be triggered, they will refer the matter to EPS. Any such referral should be made by the Headteacher having received the low-level concern and not by individual staff members.

However, if it is determined that the behaviour:

- whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis, if necessary, then action (if/as necessary) should be taken in accordance with the LADO's advice; or
- when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation, then it should be referred to the LADO

Following an investigation, it may be necessary to review policies, perceptions and training to ensure that individuals in school have the support and guidance needed to prevent low-level concerns in the future.

When staff move on

When asked to provide references for staff, we will adhere to the expectations in KCSIE. KCSIE 2021 states that:

- Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference
- Low level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

Monitoring concerns

The Headteacher will review the concerns passed throughout the term and as a minimum termly. Any patterns in behaviour or repeated referrals about an individual will result in a referral to the LADO.

The Headteacher will inform the Governing body regarding the implementation of the policy.

The Governing body should review an anonymised sample of low-level concerns to ensure that these concerns have been responded to appropriately and in accordance with this policy.

This policy will be reviewed annually as part of our Code of Conduct policy.

Clarity Around Allegation vs Low Level Concern vs Appropriate Conduct

Allegation

Behaviour that 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 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 the school’s code of conduct and/or
- Relates 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 our school's code of conduct and the law

APPENDIX 1 – LOW LEVEL CONCERNS FORM

Please use this form to share any concern – no matter how small – that an adult may have acted in a manner which:

- Is not consistent with the Stoke Park Infant School Code of Conduct and/or
- Relates 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 that are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s). The record **must** be signed, timed and dated

Details of Concern

Name of Staff Member:
Role in School:
Record of Concern:
Signed:
Print Name:
Time:
Date:

Stoke Park Infant School
Abbotsbury Road
Bishopstoke
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