

Walton CEVC Primary School

“Every Child, Every Chance, Every Day”

Low Level Concerns Policy

September 2025



Approved by the Governing Body of Walton CEVC Primary School

Chair of Governors...David Hatrey.....

Date.....27th September 2025.....

Date of Future Review- September 2027

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1. Introduction

At Walton CEVC Primary School, 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.

2. Summary

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

3. Keeping Children Safe in Education

The following is taken from Keeping Children Safe in Education September 2023

424. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

What is a low-level concern?

427. 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 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 phones, contrary to school policy*
- *engaging with a child on a one to one basis in a secluded area or behind a closed door*

- humiliating pupils.

428. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

429. Low-level concerns may arise in several ways, and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

4. 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
- is not related to their conduct outside of which, even if not limited 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 within the law.

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

Low- Level Concern forms (Appendix 1) and follow up information (Appendix 2) will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

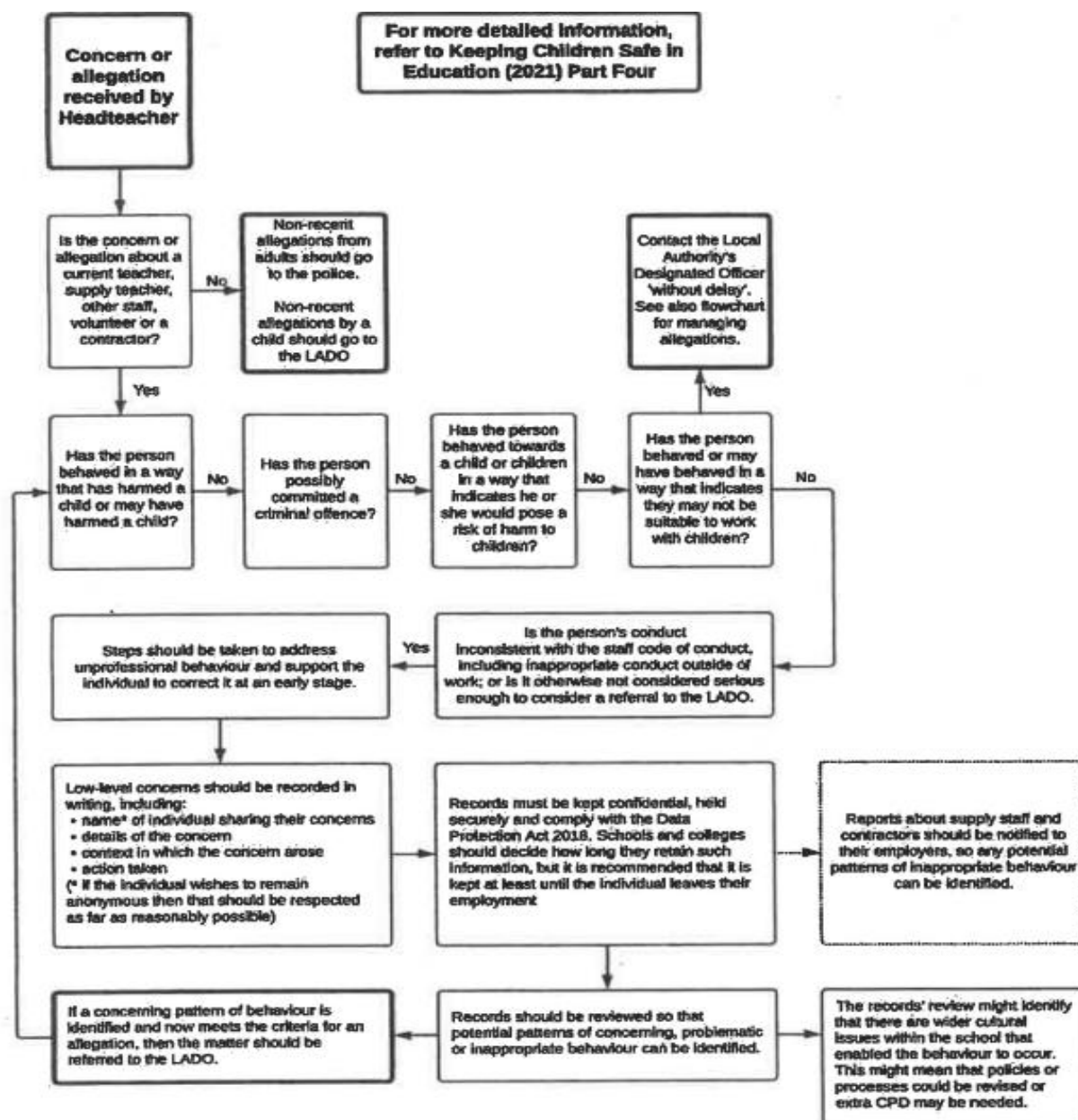
The staff members(s) reporting the concerns must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team.

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 Walton CEVC Primary School 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. Process to follow when 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 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.

7. Key Reference Document

From 1st September 2025, Walton CEVC Primary School follows the KCSiE 2025 Statutory Guidance;

Approved by Governors: September 2025

Review Date: September 2027

Low Level Record of Concern regarding a Staff Member

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 Walton CEVC Primary School's Code of Conduct, and/or
- is not related to their conduct outside of which, even if not limited to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Where possible please speak with the Head Teacher as soon as possible. It is also helpful to document your concerns, which can be done using this form and passed to the Head Teacher. If your concern is about the Head Teacher, please pass it onto the Chair of Governors or email them at david.kennedy@thebridgesedgemoor.org.uk

Please remember, a low-level concern is different to an allegation, see the table below for a definition;

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
- is not related to their conduct outside of which, even if not limited 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 within the law.

Name of adult writing this concern:

Name of adult whom this concern is about:

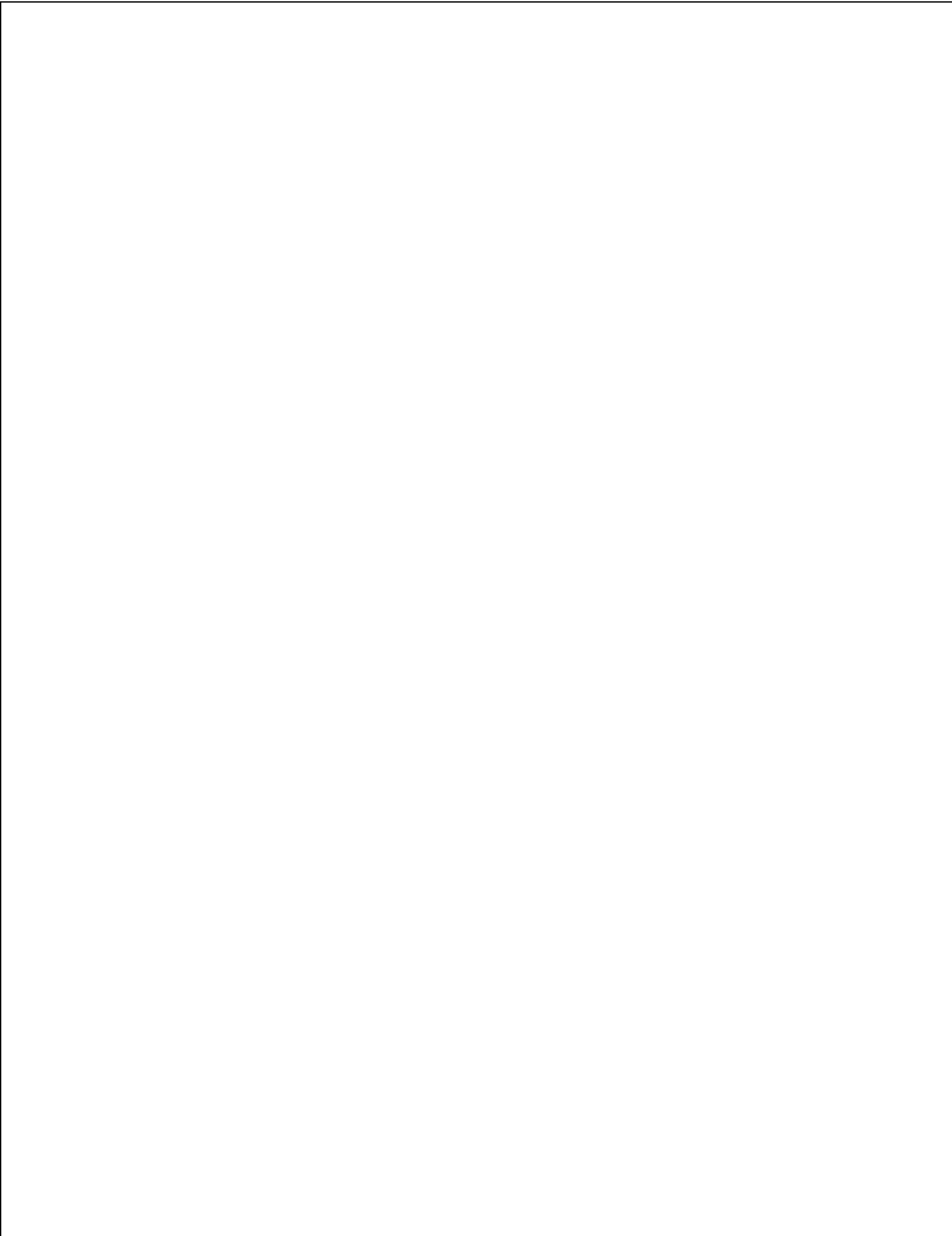
Date written:

Signature:

Please write your concerns over page

You should provide a concise record- including brief context in which the low-level concern arose, and as precise and accurate as possible- of any such concern and relevant incident(s). Consider any contextual information that may be appropriate to know.

Low-Level Concern Details



Low-Level Concern Response Form

LLC Form Received by (Name):

Date:

Time:

Action Taken:

Signed:

Name:

Date:

Time:

This record will be held securely in accordance with Walton CEVC Primary School concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but Walton CEVC Primary School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.