Sheepy Magna Church of England Primary School

Low-Level Concerns Annex to Child Protection Policy

Headteacher: Alison Field

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Chair of Governors: Tom Woollard

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Last Reviewed – September 2026

Next Review Date – September 2027

Low Level Concerns: to be read in conjunction with our Child Protection Policy

Low level concerns

This is based on concerns that do not meet the harm threshold in part 4 of Keeping Children Safe in Education.
This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors.
Concerns may arise through, for example:
Suspicion
Complaint
Disclosure made by a child, parent or other adult within or outside the school
Pre-employment vetting checks
We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns
The term 'Low-Level' concern is any concern – no matter how small – 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 designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly 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

Sharing Low-Level concerns
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
- Have clear policies and procedures
- Empowering staff to share any low-level concerns
- 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

Low Level Concerns: to be read in conjunction with our Child Protection Policy

Reporting a low level concern

- Low level concerns about a member of staff should be reported to the 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.

Staff should use the school's Low-Level Concerns Reporting Form (below)

Responding to low-level concerns

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 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.

- 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.

Record keeping

All low-level concerns will be recorded in writing (form below) . In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:
Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold we 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, so any potential patterns of inappropriate behaviour can be identified.

Reviewing a low level concern

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 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).

If the concern relates volunteers, or any other concerns arise, school can contact the LADO for further advice.

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

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; and/or • possibly committed a criminal offence against or related to a child; and/or • behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or • behaved or may have behaved in a way that indicates they may not be suitable to work with children
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 set out above. 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, on a no-names basis if necessary
APPROPRIATE CONDUCT	Behaviour which is entirely consistent with the School's staff code of conduct, and the law.

Low Level Concern 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 Sheepy Magna C of E Primary School 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. 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 and returned to the Headteacher
Detail of concern **Name of staff member**
Signed Name Date