

Low-Level Concerns Policy 2026/27

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Last Reviewed: September 2026

Next Review: September 2027

Statement of intent

Highfields Primary School is committed to creating an open and transparent safeguarding culture in which all concerns about adults working in or on behalf of the school are shared responsibly, recorded appropriately and responded to promptly.

A low-level concern does not mean that a concern is insignificant. Behaviour that appears minor, inappropriate or simply causes a sense of unease may form part of a wider pattern. Early reporting enables the school to identify concerning, problematic or inappropriate behaviour, reinforce professional boundaries, reduce the risk of harm and protect both children and adults.

The welfare and safety of children is the school's paramount consideration. Staff must report concerns about an adult's behaviour, no matter how small. Staff are not expected to decide whether a concern is a low-level concern or whether it may meet the harm threshold; that decision rests with the Headteacher, with advice from the Local Authority Designated Officer (LADO) where appropriate.

Legal and statutory framework

This policy has been written with regard to current legislation and statutory guidance, including:

- Keeping Children Safe in Education 2026 (KCSIE), particularly Part Four: safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors.
- Working Together to Safeguard Children 2026.
- Children Act 1989 and Children Act 2004.
- Education Act 2002.
- Equality Act 2010.
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

This policy should be read alongside the school's Safeguarding and Child Protection Policy, Staff Professional Conduct Policy/Staff Code of Conduct, Managing Allegations of Abuse Against Staff Policy, Whistleblowing Policy, Disciplinary Policy, Data Protection Policy, Online Safety/Social Media policies and Physical Intervention Policy.

Scope

This policy applies to concerns about any adult working in or on behalf of Highfields Primary School in a paid or unpaid capacity, including employees, supply and agency staff, trainee teachers, volunteers, contractors and other adults working with children on behalf of the school.

Concerns about adults from another organisation who are working at Highfields must still be reported to the Headteacher. The school will work with the individual's employer or relevant organisation as appropriate, while retaining responsibility for safeguarding pupils on the school site and for following applicable safeguarding procedures.

What is a low-level concern?

A low-level concern is any concern, no matter how small and even if it causes only 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 Professional Conduct Policy/Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold, or is otherwise not considered serious enough at that point to require referral to the LADO.

The term 'low-level' describes the threshold of the behaviour, not its importance. Low-level concerns must always be taken seriously and reported.

The harm threshold

A concern may meet the harm threshold where it is alleged that an adult working in or on behalf of the school 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour outside school.

Where there is any doubt about whether the harm threshold may be met, the Headteacher will seek advice from the LADO. A concern must not be treated as low-level merely because the person reporting it believes it to be minor.

Spectrum of behaviour

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 has acted in a manner which:
• is not consistent with an organisation's Code of Conduct; and/or
• relates to that conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about the adult's suitability to work with children.

Appropriate conduct behaviour which is entirely consistent with the organisation's Code of Conduct and the law

Note: This diagram is a visual aid. The full KCSIE 2026 harm threshold is set out above, including behaviour that indicates an adult may not be suitable to work with children.

Examples of behaviour that should be reported

Behaviour exists on a spectrum, from inadvertent or thoughtless conduct through to behaviour intended to facilitate abuse. Context is important, but **staff should report concerns rather than attempting to determine the threshold themselves**.

- being overly friendly with a child or failing to maintain appropriate professional boundaries;
- having favourites, showing inappropriate preferential treatment, using inappropriate pet names or giving personal gifts without an appropriate reason;
- communicating with pupils through personal social media, personal messaging accounts or personal telephone numbers;
- taking photographs, video or audio recordings of pupils on a personal device;
- unnecessary or inappropriate physical contact;
- being alone with a child in a secluded area or behind a closed door where this is not justified by the role, agreed practice or an assessed need;
- humiliating, intimidating, belittling or using inappropriate, discriminatory or sexualised language towards or in the presence of children;
- sharing personal information or engaging children in conversations about an adult's private life that are inappropriate to the professional relationship;
- behaviour outside work that raises a question about the adult's suitability to work with children.

Some of these behaviours may meet the harm threshold depending on the circumstances, the child's age or needs, the nature of the conduct, previous concerns or other contextual information. Equally, behaviour may be appropriate in context. This is why all concerns should be reported and evaluated.

Creating a culture of safety

Highfields will maintain a culture in which safeguarding children takes priority over professional loyalty or fear of causing difficulty for a colleague. Staff will be supported to raise concerns in good faith and will not be criticised for reporting behaviour that is subsequently found to be appropriate.

All adults working in or on behalf of the school will be made aware of professional expectations, safer working practices and the low-level concern reporting process through induction, safeguarding training and regular reminders.

Adults working in or on behalf of Highfields occupy a position of trust, care, responsibility, authority and influence in relation to pupils. Staff must recognise the inherent power imbalance in the adult-pupil relationship and maintain appropriately professional boundaries at all times. All pupils under the age of 18 are children in law, regardless of their maturity or year group.

The school will encourage self-reporting. An adult should speak to the Headteacher if they believe their own behaviour could have been misinterpreted, appeared compromising or fallen below the standards expected. Self-reporting enables the school to address concerns early and transparently; it does not automatically mean that misconduct has occurred.

Reporting a concern

Staff must report any concern about the behaviour of an adult working in or on behalf of the school as soon as possible and without delay.

- Concern about any adult other than the Headteacher: report directly to the Headteacher.
- Concern about the Headteacher: report directly to the Chair of Governors.

A concern may initially be reported verbally. The person receiving it will ensure that an appropriate written record is made without delay. All low-level concerns will be recorded by SLT using the StaffSafe area of CPOMS.

The Headteacher is the ultimate decision-maker in relation to low-level concerns about adults other than themselves. The DSL may support the Headteacher with safeguarding information and advice, but this does not remove the Headteacher's responsibility for determining the appropriate response.

Where the concern involves supply staff, agency staff, a trainee teacher, volunteer, contractor or another externally employed adult, the Headteacher will also liaise with the individual's employer or relevant organisation as appropriate.

Where the concern relates to the Headteacher, the Chair of Governors will follow the same principles and seek LADO and/or HR advice as appropriate.

Staff may request that their identity is kept confidential. The school will respect this as far as reasonably possible but cannot promise anonymity where disclosure is necessary to safeguard a child, ensure a fair process or meet a legal obligation.

Anyone reporting a concern must keep the matter confidential and must not discuss it with colleagues or others except the Headteacher, Chair of Governors or another person who needs the information for safeguarding, HR or legal purposes.

If a member of staff feels unable to raise a safeguarding concern through the school's normal procedures, they should follow the Whistleblowing Policy.

Responding to and evaluating concerns

On receiving a concern, the Headteacher will gather sufficient information to establish the facts and determine the appropriate threshold and response. The Headteacher will:

- speak to the person who raised the concern, unless it was raised anonymously;
- consider the context and any relevant safeguarding information;
- review the concern against the Staff Professional Conduct Policy/Staff Code of Conduct and applicable safeguarding guidance;
- consider any previous low-level concerns or allegations relating to the same adult;
- decide whether the behaviour is consistent with expected conduct, constitutes a low-level concern, may meet the harm threshold, or requires advice from the LADO or another agency;
- seek advice from the LADO whenever there is doubt about whether the harm threshold may be met;
- where appropriate, speak to the adult about whom the concern has been raised and give them an opportunity to respond, unless advised not to do so by the LADO or another relevant agency; and
- make an accurate record of the concern, actions, decisions, rationale and outcome.

The Headteacher will not undertake an internal investigation where doing so could compromise a LADO, police or children's social care process.

Where the behaviour is consistent with expected conduct

If the concern is found not to represent inappropriate conduct, the Headteacher will record the decision and rationale. The Headteacher will determine whether any further discussion or guidance is necessary. Where appropriate, the person who raised the concern will be reassured that reporting it was the correct action and must not be discouraged from raising concerns in future.

Where the concern is low-level

Where the Headteacher determines that the concern is low-level, the response will be proportionate to the behaviour and circumstances. This may include:

- a professional conversation and clarification of expected standards;
- guidance, coaching, supervision or additional training;
- re-reading relevant policies or safer working guidance;
- an agreed action plan or increased supervision where appropriate;
- consideration of whether disciplinary or capability procedures are required;
- pastoral support for any child or adult affected by the behaviour.

A low-level concern does not automatically result in disciplinary action. However, behaviour may justify formal action depending on its nature, repetition, context or impact.

Where the concern may meet the harm threshold

If the concern may meet the harm threshold, or a pattern of low-level concerns means the threshold may now be met, the Headteacher will cease to manage the matter solely as a low-level concern and follow the school's Managing Allegations of Abuse Against Staff Policy and local LADO procedures without delay.

Patterns and wider organisational learning

Low-level concerns will not be considered only in isolation. The Headteacher and DSL will periodically review records to identify patterns of concerning, problematic or inappropriate behaviour by an individual or across the staff group.

A pattern of concerns that individually does not meet the harm threshold may, when considered collectively, indicate a safeguarding concern requiring further action or consultation with the LADO.

Reviews will also consider whether concerns identify wider issues relating to school culture, supervision, working practices, policies, professional boundaries or staff training. Where necessary, the school will take action to strengthen practice.

Record keeping and confidentiality

Where a low-level concern is reported verbally, the Headteacher or member of SLT receiving the concern will make an appropriate record as soon as possible following the discussion. Professional judgement will be used to determine the information necessary to provide a clear and accurate safeguarding record.

All low-level concerns will be recorded by SLT using the StaffSafe area of CPOMS.

The record should include, where appropriate:

- the name of the individual sharing the concern; where they request confidentiality or anonymity, this will be considered and respected as far as reasonably possible;
- the name and role of the adult about whom the concern has been raised;
- who the concern was reported to;
- a clear, factual and comprehensive summary of the concern and its context;
- the views or response of the adult about whom the concern has been raised, where these have been obtained;
- any advice sought, including from the LADO or HR where applicable;
- details of how the concern was considered, followed up and resolved;
- any actions taken, decisions reached and the rationale for those decisions;
- the outcome and any required follow-up or monitoring; and
- the name of the person completing the record and the date it was recorded.

Low-level concern records and any associated information, including records of meetings, advice received and action plans, will be treated as confidential safeguarding information and stored securely within StaffSafe on CPOMS. Access will be restricted to appropriately authorised members of SLT and other individuals where access is necessary for safeguarding, HR or legal purposes.

The Headteacher and DSL will periodically review StaffSafe low-level concern records to identify any patterns of concerning, problematic or inappropriate behaviour relating to an individual or across the staff group. A pattern of concerns which individually does not meet the harm threshold may, when considered collectively, require further action or consultation with the LADO.

Records will be retained and disposed of in accordance with current statutory guidance, the school's records-retention arrangements and data-protection requirements. Information will be shared only where there is a lawful and proportionate reason to do so.

References

Low-level concerns will not normally be included in employment references unless they relate to matters that would ordinarily be included in a reference, for example where a concern has met the harm threshold and has been substantiated, or where relevant misconduct or poor performance has resulted in formal action.

Allegations or concerns that are false, unfounded, unsubstantiated or malicious will not be included in references. References will be completed in accordance with KCSIE, employment law, the school's reference procedures and any relevant HR advice.

Governance

The Governing Body will ensure that Highfields has effective procedures for managing safeguarding concerns and allegations about adults working in or on behalf of the school, including low-level concerns.

The Governing Body will receive appropriate assurance through the termly safeguarding report about the implementation and effectiveness of this policy, including anonymised themes or patterns and actions taken to strengthen safeguarding

culture. Individual case details will only be shared where necessary for the Governing Body to fulfil its safeguarding responsibilities.

The Chair of Governors will manage concerns about the Headteacher in accordance with this policy, KCSIE, the school's Managing Allegations of Abuse Against Staff Policy and local LADO procedures.

Monitoring and review

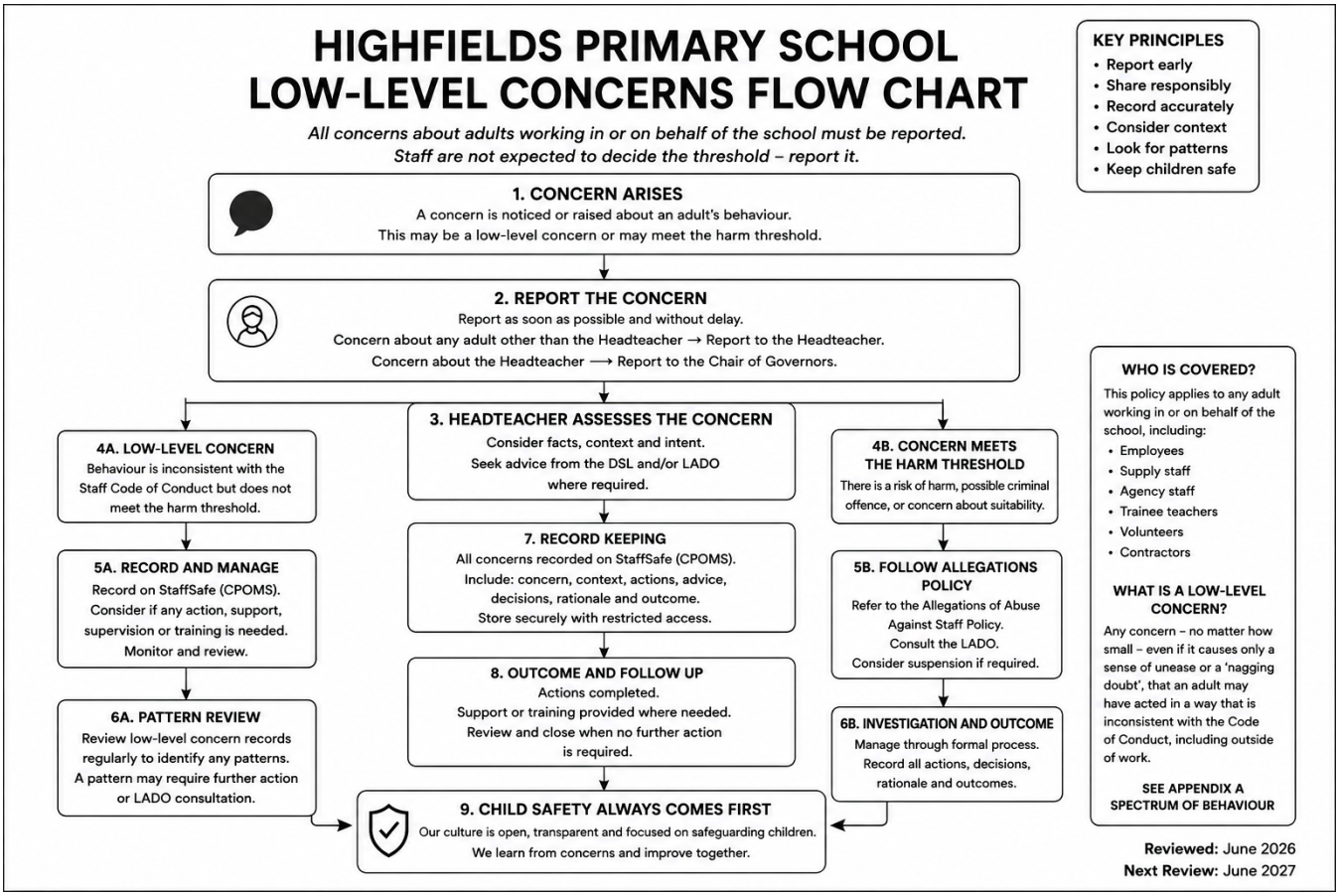
The Headteacher and DSL will review the operation of this policy regularly and following any significant safeguarding incident, change in statutory guidance or identified weakness in school practice.

This policy will be reviewed formally at least annually.

The next scheduled review is September 2027.

Appendix A – Action Flow Chart

The Sandwell model flow chart is reproduced below as a visual reference. The Highfields reporting and recording arrangements set out beneath it take precedence where the older diagram refers to previous guidance or paper records.



Appendix B – StaffSafe (CPOMS) Low-Level Concern Record

Highfields does not require staff to complete a separate low-level concern form. Concerns may be reported verbally and must be reported without delay. SLT will create the formal safeguarding record in the StaffSafe area of CPOMS.

StaffSafe field	Information to record
Date/time concern received	
Adult the concern relates to	Name, role and employer/organisation where relevant
Concern reported by	Name and role; note any request for confidentiality/anonymity
Reported to	Headteacher / Chair of Governors
Incident/context	Date, time, location, pupils/others involved and relevant context
Clear factual summary of concern	Record what was seen, heard or reported. Distinguish fact from opinion where possible.
Adult's response/view	Where obtained and appropriate to record
Previous concerns checked	Relevant previous low-level concerns/allegations and whether a pattern is emerging
Advice sought	LADO / HR / other agency; include date, person spoken to and advice received
Threshold decision	Appropriate conduct / low-level concern / may meet harm threshold
Decision and rationale	Record why the threshold decision was reached
Action taken	Guidance, training, supervision, action plan, HR/disciplinary process, safeguarding action or other response
Outcome and follow-up	Including review/monitoring arrangements
Recorded by / date	Name, role, date and time

The StaffSafe record and any linked meeting notes, advice or action plans are confidential safeguarding records.

Access must be restricted to appropriately authorised staff and others who require the information for safeguarding, HR or legal purposes.

StaffSafe on CPOMS is the school's primary chronology. Where more than one concern relates to the same adult, records should be linked and reviewed together. Where a pattern emerges, the Headteacher will reconsider the threshold and seek LADO advice where appropriate. The review should also consider whether wider changes to policy, training, supervision or school culture are required.