



**Lincoln Bishop King CE Primary School**

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# **Low Level Concern Policy**

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## **1. Introduction**

There are occasions where an incident occurs, which doesn't meet the harms threshold but may be significant enough to warrant action. The Keeping Children Safe in Education guidance describes such occasions as low level concerns.

This policy applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the 'harm threshold' section 2, part 4 of Keeping Children Safe in Education.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff.
- 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.

## **2. Definition of low-level concerns**

A low-level concern is defined as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult exhibits inappropriate behaviours and or actions, working in or on behalf of the school 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.
- Humiliating pupils.
- 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.
- Non-disclosure of criminal offences that occur during the employee's employment.

## **3. Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to confidentially 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, are familiar with the school's whistleblowing policy 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 as per the whistleblowing policy.
- 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.

All low-level concerns should be shared, in the first instance, with the headteacher. (See section 4, Responding to low level concerns).

#### **4. 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 relevant policies. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the school's safeguarding team and/or the school governors / senior leadership team.

Procedures will be followed as directed within identified relevant policies.

#### **5. Record keeping**

All low-level concerns will be recorded in writing. 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.
- Retained at least until the individual leaves employment at the school.
- 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.

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.

## **6. 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.

## **7. Linked policies**

Code of Conduct Policy

Disciplinary Policy

School Child Protection & Safeguarding Policy

Whistleblowing Policy