



ST. ALBAN'S
Catholic Primary School

St. Alban's Catholic Primary School

Low Level Concerns Policy

Updated: September 2025
To be reviewed: September 2026

St Alban's Catholic Primary School

Low Level Staff Concerns Policy

At St Alban's Catholic Primary School, we are committed to having an open, transparent and safer culture so that our approach to policy and practise in safeguarding is one rooted in vigilance and so that all concerns about staff are heard, recorded, actioned and allow us to be proactive and timely in managing risk presented by those in a position of trust with our pupils. St Alban's will identify concerning, problematic or inappropriate behaviour early to reduce the risk of escalation or exploitation of pupils, and so that all staff working here (in whatever capacity) are clear about the professional boundaries required.

The safest place for children will be one where all professional and personal boundaries are clear in all aspects of people's roles and behaviours, and are fully adhered to. All St Alban's employed staff have read the Safer Practises document.

What is a Low Level Concern?

A Low Level Concern is a small concern that a child, parent, member of staff, member of the public may have about a member of the employed, supply, contractor or voluntary staff working with children at our school. Often, low level concerns are seen as isolated, unconnected incidents and while one incident that causes concern may not be LADO worthy, it must be considered, recorded and explored in case it builds a bigger picture for the school about the conduct of a member of staff.

The staff body may not be aware of previous concerns raised and so we should never look at incidents in full isolation, just in case.

KCSIE says:

The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold set out in KCSIE section referring to 'Concerns or allegations that may meet the harm threshold.' 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 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 LADO.

Some staff behaviours may not cause immediate harm to children but they are nonetheless inappropriate or are a clear breach of the St Alban's Staff Code or Volunteer Code of Conduct. It is important to state that Low Level Concerns are not insignificant – they are concerns that do not meet the harm threshold and therefore do not automatically generate a referral to the LADO. This policy sets out the steps that will be taken in these instances.

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 have shared what they believe to be a low-level concern, the Head Teacher (with advice from the LADO if necessary) should make that determination.

What behaviours could be examples of Low Level Concerns?

Behaviour exists on a spectrum and the concerning actions taken by staff can range from careless, to thoughtless, to inappropriate depending on the specific circumstances. The context of our contact with children is significant when evaluating whether an action is appropriate or inappropriate. The behaviour might not actually involve a child or children at all but may still be an action, which may question a member of staff's suitability to work with children. In many cases, inappropriate behaviours are obvious in light of the guidance and expectations of KCSIE. Such concerns are often the "nagging doubts" that you might have when you see or hear something that causes you concern. We must be vigilant to all concerns, even those that do not meet the harm threshold and all such concerns are a collective responsibility. In cases of a harm threshold allegation, it is often the case that many low level concerns preceded the incident whereby a member of staff is referred to the LADO.

Some examples might 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
- Giving out non-authorised rewards to certain pupils
- Undermining staff/difficult to manage
- Inappropriate or questionable conduct outside school

Allegations that may meet the harm threshold

The following is **not** low level concerns. The term 'allegation of harm' means that it is alleged that a person who works with children meets the harm threshold as specified below:

- 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

When should I share a low level concern?

If you have a concern about the conduct of yourself or another member of staff, you should share it at the earliest opportunity with the Head Teacher. It does not matter if the concern seems small. The staff member reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team. If there has been a delay in reporting, for whatever reason, staff should still feel

empowered to disclose their concerns after the fact so that the school can use the information to keep children safe.

How do I share a concern and what will happen?

Sharing information in this manner is a neutral act – staff are in no way making accusations or determining actions that will be taken in respect of their concerns. In sharing this information, staff are ensuring a safe and transparent environment for all so that no one with intent to abuse children will go unobserved at St Alban's. All staff should see this policy as empowering of their safeguarding roles...

1. Discuss the concern with the Head Teacher at the earliest opportunity (this includes concerns you have about your own conduct in a particular incident)

a. In the absence of the Head Teacher, the identified Acting Assistant Headteachers for such concerns is Miss Ingram or Mrs Jones

b. If the concern is about the Head Teacher the concern should be shared with the Chair of Governors, or in his absence the Vice Chair

2. Anonymity cannot be promised for staff members who disclose concerns under this policy as this would jeopardise fair disciplinary processes – staff should disclose concerns openly and with their name attached to support our school values with respect to safeguarding

3. If the concern is about yourself, you are actively encouraged to self-report any conduct that could be perceived as inappropriate or compromising, especially if you know it is a breach of the Staff

Code of Conduct or the Safeguarding Policy

a. Such self-reporting shows awareness of safeguarding protocols, behaviour expectations and is a reflection of your own conduct and will not be used negatively in this process

4. The Head Teacher will listen to what you are concerned about and may take notes then or after the meeting (recording only what is relevant)

5. The Head Teacher may ask you to write your concern down in detail if it is complex

6. The Head Teacher will ask the reporting member of staff to read the notes and sign and date

7. The Head Teacher may at this point go straight to LADO support before actioning this process further, dependent on what has been shared by the member of staff raising the concern

8. The Head Teacher may speak to any named witnesses (if the LADO agrees)

9. The Head Teacher will speak with the member of staff who is the centre of the concern

a. That staff member will be presented with the concern, listened to and any factual explanation will be recorded alongside the concern account (including any contradictions so that fair voice has been given to both accounts)

b. The staff member will sign and date the account

10. The Head Teacher will provide a responsive, sensitive, proportionate handling of the concern – the person raising the concern may not receive personal feedback about the actions taken but they will be recorded

- a. The person who is the centre of the concern will know all actions taken and outcomes
- b. There will be a determination of one of the following:
 - i. Appropriate behaviour – entirely consistent with the Code of Conduct and no further action required but a discussion may be necessary to prevent any repeat of behaviours that caused the concern to be raised. The Head Teacher will also discuss this outcome with the person who raised the concern to explain why it is not a concern. May result in additional whole staff training.
 - ii. Low Level Concern – not consistent with the Code of Conduct action. To be determined on a case -by-case basis. All investigations will be handled discreetly. May result in support, guidance, training, direct instruction, reiteration of school values and expectations, action plan, review period, competency/capability proceedings, disciplinary (or other internal procedures). Will result in whole staff training.
 - iii. LADO Consult – not serious enough for the LADO but where there is ambiguity further advice will be sought
 - iv. In and of itself, the behaviour may meet the harm threshold – further referral to the LADO and other external agencies as advised
 - v. When considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold – further referral to the LADO and/or other relevant external agencies as advised
 - vi. The Head Teacher will refer to the LADO where there is any uncertainty

11. The Head Teacher will risk assess to identify any weaknesses in school policy that need to be addressed.

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. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It is believed that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening. 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.

Where a low level concern relates to a person employed by a supply agency or a contractor, that concern will be raised with their employers, so that any potential patterns of inappropriate behaviour can be identified. How St Alban's responds to a low level concern may be different depending on the employment status of the individual who is the subject of the concern - whether they are an employee, or worker to whom the organisation's disciplinary procedure would apply or a contractor, Governor or volunteer who may be subject to alternative procedures.

Some concerns raised may trigger the school's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate. Where low level concerns are raised

which require other internal processes to be followed, the Head Teacher will exercise their professional judgement and, if in any doubt, they will seek advice from other external agencies including the LADO to ascertain the best route to follow. If the school's disciplinary procedure is triggered, the school will ensure that the individual has a full opportunity to respond to any factual allegations, which form the basis of a disciplinary case against them.

Can Parents Use this Policy?

Parents should also feel at ease to report any low level concerns they may have about staff at St Alban's. Where a parent has a concern, they should make an appointment to see the Head Teacher at the earliest opportunity and advise the office that they have a concern about a staff member that they wish to discuss. The Head Teacher will see parents as quickly as possible and will:

- Listen to the concern they have
- Ensure the correct member of staff is identified
- Record as much detail as the parent has to share
- Advise the parent about what next steps, if any, will be taken based on the information given
- Action with the member of staff named as a concern, as described above and keep a record of any actions taken or referrals made
- Keep a record of the concern in the Low Level Concern Folder (held with the LADO Referral Folder in the Head Teacher's office)

What will happen to Records of Low Level Concerns?

Whenever staff leave St Alban's, 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:

☐ 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

☐ If, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly

Schools can decide where these records are kept, but they must be kept confidential, held securely and comply with GDPR. That legislation, similarly, does not prescribe specific retention periods, but requires a purpose-based approach. The standard period of retention is for 7 years after employment has ended unless the safeguarding value warrants a longer retention.

Staff will be informed about what action will be taken with the records of low level concerns and have a right to know what information is being held about them. Staff will be given an opportunity to add their voice to any such record and to have any contrary comments noted alongside. Staff can seek trade union advice as necessary if they believe the retention of such information is contrary to their employment or GDPR rights.

Some low level concerns may also involve issues of misconduct or poor performance, and may trigger our school's disciplinary, capability, grievance, whistleblowing or other procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low level concerns being retained in the Head Teacher's low-level concerns file.

Will a Low Level Concern be referred to in a Reference?

KCSIE is clear that schools should only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low level concerns 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. It follows that a low-level concern, which relates exclusively to safeguarding (and not to misconduct or poor performance), should not be referred to in a reference.

Informing Governors

The Governing Body will be kept informed of statistical information related to low level concerns and the Safeguarding Governor will feedback on any anonymised documentation he reviews.

Spectrum of Behaviour (Farrer & Co Sept 2022)

Concern or allegation that may meet harm threshold

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. 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 with children 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 harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

Appropriate conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Policy Review: September 2023

Policy Consultation: N/A Statutory Document

Policy Implementation: Immediate

GB Ratification of Policy: September 2025

Review Date: September 2026

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 St Alban's staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO

You should provide a concise record (online/electronically or hard copy) – 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.

St Alban's Catholic Primary School
Safeguarding - Low Level Concern Form (Official Record)

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 St Alban's staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO

You should provide a concise record (online/electronically or hard copy) – 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.

Name of Staff Member:

Name of Reporting Person: Relationship to Staff Member: Colleague / Parent / Pupil / Governor / Member of the Public

Details of concern:

Disclosure received by:

Signature of person recording:

Date: Time:

Signature of person disclosing (true and fair record of disclosure): Date: Time:

Actions taken:

Signature:

Date:

Time: