

Trusting in God; Growing in Wisdom



## Low Level Concerns Policy

**Date: March 2026**

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## School Vision

With **thankful** hearts, we **trust** in God as we **grow** in his **love** which **shines** through us. We aim to live our **faith** and grow in **wisdom**.

*And Jesus grew in wisdom and stature, and in favour with God and people. (Luke 2:52)*

*But the wisdom from above is pure first of all; it is also peaceful, gentle, and friendly; it is full of compassion and produces a harvest of good deeds; it is free from prejudice and hypocrisy. (James 3:17)*

At Whitegate Church of England Primary School, we believe that all people are made in the image of God and are unconditionally loved by God. Everyone is equal and we treat each other with dignity and respect. Our school is a place where everyone should be able to flourish in a loving and hospitable community. We are committed to providing a warm, caring and safe environment for all our children so that they can learn and play in a relaxed and secure environment. In order to do this we follow the example of Jesus Christ who taught us to 'love one another as I have loved you.' (John 13v34)

### 1. Policy Statement

- 1.1 The policy outlines Whitegate CofE Primary School's approach to managing concerns about adults, which do not meet the allegation threshold of harm nor are considered serious enough to consider a referral to LADO.
- 1.2 For the purpose of this policy, the term 'staff' will refer to any adult associated with Whitegate CofE Primary School, i.e. whether working for or with the school, engaged as a paid employee, worker or self-employed contractor, volunteer, Agency staff or governor.
- 1.3 This policy does not form part of any member of staff's contract of employment, and it may be amended at any time.

### 2. Roles, Responsibilities, and Implementation

- 2.1 The Governing Board has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Head teacher, with formal adoption agreed by the Governing Board.

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2.2 Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all staff are responsible for supporting colleagues and ensuring its success. Our school is committed to safeguarding and promoting the welfare of children and young people and expects all to share this.

### 3. Aims

- 3.1 To ensure that all concerns about adults can be identified and spoken about openly with the appropriate safeguarding team.
- 3.2 To ensure that all concerns about adults are recorded and dealt with appropriately.
- 3.3 To create an open and transparent culture which enable settings to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working for or with our school are clear about professional boundaries and act within them, in accordance with the ethos and values of our school.

### 4. Definition

4.1 A low-level concern is 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:

- a) is not consistent with our school’s Code of Conduct; and/or
- b) relates to their conduct either inside or outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

4.2 Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Head teacher.

4.3 The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils. Staff will ensure that they pay due regard to the fact that:-

- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

4.4 Staff will remain aware of the fact that all pupils under the age of 19, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that

they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers.

- 4.5 Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Head teacher/DSL immediately.

## 5. The Importance of Sharing Low-Level Concerns

- 5.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe (*Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers*).

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1062969/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf)

- 5.2 All concerns, no matter how small, must be reported.

## 6. Reporting a Low-Level Concern

- 6.1 In line with our school's Whistleblowing Policy, any concerns should be raised first with the Head teacher. In the absence of the Head teacher the concern should be raised with the Deputy Designated Safeguarding Lead (DDSL). The Head teacher or DDSL will inform the Human Resources Provider if required.
- 6.2 Concerns about the Head teacher must be reported to the Chair of Governors who will inform the DDSL (if assessed to be a low-level concern and not meeting LADO threshold) and the Human Resources Provider.
- 6.3 Concerns about a governor must be reported first with the Head teacher. In the absence of the Head teacher the concern should be raised with DDSL.
- 6.4 If a concern is reported to the DDSL, as opposed to the Head teacher, the DDSL must inform the Head teacher at the earliest opportunity.

## 7. Self-Reporting

- 7.1 Occasionally, an individual might find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an individual may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code

of Conduct. In these instances, an individual may wish to self-report and this is encouraged. This can be positive for a number of reasons:

- it enables a potentially difficult issue to be addressed at the earliest opportunity.
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and
- it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Any individual who wishes to self-report should speak with the Head teacher.

## 8. Response to a Low-Level Concern

- 8.1 In the event that a low-level concern is raised, the information will be reviewed to determine whether the behaviour:
- i. is entirely consistent with our school's Code of Conduct and the law;
  - ii. constitutes a low-level concern;
  - iii. is serious enough to consider a referral to the LADO; or
  - iv. when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies.
- 8.2 Where necessary, our school will initially seek the advice of the SCiE team (maintaining the anonymity of the individual where possible).
- 8.3 Where appropriate, either the Head teacher or DDSL will speak with the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

## 9. Outcomes

### i. The behaviour is entirely consistent with the school's Code of Conduct

The individual in question will be informed by the appropriate DSL/Head teacher what was shared about their behaviour so that they have an opportunity to respond. The individual in question will be informed that their behaviour is entirely consistent with the school's Code of Conduct.

The DSL will also speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Code of Conduct and the law.

### ii. The current concern is low-level

The individual in question will be informed by either the DSL/Head teacher what was shared about their behaviour so that they have an opportunity to respond.

The DSL/Head teacher, (with advice from their HR Provider if necessary) will determine the most suitable response. This may include:

- A conversation with the individual about their behaviour and why it was deemed to be a low-level concern
- Training
- Mentoring from an appropriate individual, e.g. a line manager
- Any support as identified by the individual themselves

In the event that the concern becomes a disciplinary matter, our school's Staff Disciplinary Policy will be followed.

- iii. **The current concern is sufficiently serious enough to warrant a referral to the LADO or when considered with any other low-level concerns that have been shared about the same individual, should be reclassified as an allegation**

In the event that the current concern should be referred to the LADO or reclassified as an allegation, our school's Whistleblowing Policy will be followed.

## 10. Recording

- 10.1 A low-level concerns record will be kept centrally by the DSL/Head teacher. This record will be accessible to the Head teacher/DSL and Deputy DSL. It will **NOT be kept in the staff member's personnel file.**
- 10.2 The concerns record will be kept in a chronological order as a running record. Each entry will have the time and date recorded, along with the name of the individual who has made the record and the outcome of the concern. The records will be kept confidential and will be held securely.
- 10.3 The records will be held centrally so that they can be easily reviewed by the Head teacher/DSL and Deputy DSL and any potential patterns of concerning, problematic or inappropriate behaviour spotted.
- 10.4 If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO, the records relating to the low-level concern will be placed on the individual's personnel file.
- 10.5 If a low-level concern (or group of concerns) is re-classified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the individual's personnel file.
- 10.6 If the low-level concern is raised about an individual who works with our school, but is not a member of staff, e.g. Agency Staff/Contractor, then any records relating to the concern will be shared with the individual's employer. If necessary, advice will be sought from the LADO on what can be shared and with whom.
- 10.7 The Head teacher/DSL and the Deputy DSL will be responsible for recording any concerns.

## 11. Review period

11.1 This policy will be reviewed on an annual basis.

**Date of Policy: March 2026**

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<b>APPROVED:</b>	<b>17.03.26</b>
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