

Sandy Lane Nursery and Forest School
"Nurturing curiosity and inspiring imagination"



2026-27 Low Level Concerns Policy

DOCUMENT STATUS

Produced By	Version	Date	Action
Sandy Lane Nursery and Forest School	1	07.11.22	Approved by Teaching and Learning Committee
	2	03.12.24	Approved by full governing body
	3	07.07.26	Approved by full governing body
	4		Pending FGB Approval

Approval

Governing body free to delegate to a committee of the governing body, an individual governor or the headteacher

Review

Whenever there are changes to report

Amendments

v2

- Updated names of safeguarding governor and chair of governors
- Updated KCSIE (Keeping Children Safe In Education) 2024 link
- Low level concerns amended in line with KCSIE 2024

v3

- Update to KCSIE 2025
- Updated link to KCSIE 2025

V4

Updated to Keeping Children Safe in Education (KCSIE) 2026

Updated low-level concerns procedures, recording, retention, references and response arrangements in line with KCSIE 2026

Change of SG governor

Sandy Lane Nursery and Forest School

SCHOOL DETAILS

Headteacher:	Marcia Atherton
Designated Safeguarding Lead (DSL):	Kirsten Matthews
Deputy Designated Safeguarding Lead:	Marcia Atherton
Second Designated Safeguarding Lead;	Nicola Carney
Designated Governor for Safeguarding:	Craig Burgess
Chair of Governors:	Maureen Banner

CONTENTS

		Page
1	Introduction	4
2	Summary	4
3	Keeping Children Safe in Education September 2026	4
4	Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct	5
5	Storing and use of Low-Level Concerns and follow-up information	5
6	Process to follow when a Low-Level Concern is raised	7
7	Low-Level Concern Reporting Form	8

1. Introduction

At Sandy Lane Nursery and Forest School, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries in accordance with our school ethos.

This policy should be read alongside our Safeguarding and Child Protection Policy, Staff Code of Conduct Policy and Volunteer Policy.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children but is, however, inappropriate. A member of staff who has a concern about another member of staff, volunteer or contractor should inform the headteacher about their concern using a *Low-Level Record of Concern Form*. This form should also be completed by any staff member who feels, on reflection, that their actions could have been viewed as a risk to children in their care or that their behaviour has fallen below the standard set out in the Staff Code of Conduct. If the headteacher is absent, completed forms should be handed to the deputy headteacher. In the absence of both these staff members, forms should be handed to the second designated safeguarding lead (Nicola Carney).

3. Keeping Children Safe in Education September 2026

This section reflects Keeping Children Safe in Education September 2026 (KCSIE 2026), Part Four, Section Two, paragraphs 507–527. KCSIE 2026 is statutory guidance which Sandy Lane Nursery and Forest School has regard to when safeguarding and promoting the welfare of children.

What is a low-level concern (LLC)?

KCSIE 2026 states that a low-level concern is not necessarily insignificant. It is any concern, however small, including 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 Code of Conduct, including inappropriate conduct outside work, and which does not meet the harm threshold or is otherwise not serious enough to warrant referral to the LADO. (KCSIE 2026, paragraph 509.)

Examples may include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating children.

KCSIE 2026 recognises that low-level concerns can exist on a wide spectrum, from inadvertent or thoughtless behaviour, or behaviour that may appear inappropriate but is not

inappropriate in the particular circumstances, through to behaviour that may ultimately be intended to enable abuse. (Paragraph 510.)

Low-level concerns may arise from suspicion, a complaint, or a disclosure made by a child, parent or another adult inside or outside the organisation, or through information arising from vetting checks. (KCSIE 2026, paragraph 511.)

All low-level concerns must be shared responsibly with the appropriate person and recorded and dealt with appropriately. Effective management of concerns helps identify inappropriate behaviour early, minimise risk and protect staff from misunderstandings or potentially false concerns. (KCSIE 2026, paragraph 512.)

The current KCSIE 2026 guidance is available on GOV.UK:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation: a concern which may meet the harm threshold, including where an adult may have harmed a child, may have committed a criminal offence against or related to a child, or may have behaved towards a child in a way that indicates they may pose a risk of harm. Allegations must be managed under the school's safeguarding procedures and local authority arrangements, including consultation with the LADO where required.

Low-Level Concern: behaviour that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold or is otherwise not serious enough to warrant referral to the LADO. All low-level concerns must be shared, recorded and appropriately considered.

Appropriate Conduct: behaviour that is consistent with the school's Staff Code of Conduct, safeguarding procedures and professional expectations.

5. Storing and use of Low-Level Concerns and follow-up information

Low-Level Concern forms and follow-up information will be recorded in writing and stored securely and confidentially within the school's safeguarding systems. Records will be managed in accordance with applicable data protection laws, including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.

The identity of the person sharing the concern will be recorded. If the person wishes to remain anonymous, this will be respected as far as reasonably possible. Staff should maintain confidentiality and only share information with those who need to know in order to safeguard children and manage the concern.

Low-Level Concerns should not normally be included in references. However, they may be included where they relate to matters that would normally be included in a reference, such as misconduct or poor performance. A low-level concern relating exclusively to safeguarding, and not to misconduct or poor performance, should not be included in a reference. (KCSIE 2026, paragraph 524.)

Records of low-level concerns should be reviewed regularly so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern is identified, the school will consider whether disciplinary action is required or whether the pattern has moved into the harm threshold and should be referred to the LADO. The school will also consider whether wider cultural, policy, supervision or training issues contributed to the behaviour.

Retention of records

- (a) Sandy Lane Nursery and Forest School will decide how long low-level concern records are retained, taking account of safeguarding, employment and data protection requirements. In line with KCSIE 2026, records will normally be retained at least until the individual leaves their employment. Records will then be reviewed in accordance with the school's retention arrangements and data protection requirements. (KCSIE 2026, paragraph 523.)
- (b) Records will not be deleted simply because an individual leaves employment if there is a continuing safeguarding, employment or legal reason to retain them.

6. Process to follow when a Low-Level Concern is raised

1. Any member of staff who has a low-level concern about another adult working in or on behalf of the school (including supply staff, volunteers or contractors) should report it without delay to the Headteacher or DSL, in accordance with this policy.
2. Staff are encouraged to self-refer where they recognise that they have been in a situation which could be misinterpreted, appeared compromising, or where they believe their behaviour has fallen below expected professional standards.
3. Where the DSL receives the concern, the Headteacher will be informed in a timely manner. The Headteacher is the ultimate decision-maker for low-level concerns, while consulting the DSL or others where appropriate.
4. The Headteacher or nominated deputy will gather as much relevant information as possible, including speaking to the person who raised the concern (unless anonymous), the individual concerned and relevant witnesses.
5. The information will be recorded, including the concern, context, evidence considered, decisions, rationale, actions taken and outcome. The concern will then be categorised and appropriate action agreed.
6. If there is uncertainty about whether the concern meets the harm threshold, the school will consult the LADO.
7. Concerns about supply staff or contractors will also be notified to their employer so that potential patterns of inappropriate behaviour can be identified.
8. Where a concern meets the harm threshold, or a pattern of behaviour moves from a low-level concern to meeting the threshold, the school will follow the procedures for allegations against adults and refer to the LADO as appropriate.
9. Low-level concern records will be reviewed to identify patterns and any wider safeguarding, cultural, policy, supervision or training issues.

*NB – if the concern is about the Headteacher, the concern should be reported to the Chair of Governors (Maureen Banner). The Chair of Governors will act as the case manager in accordance with the school's procedures for allegations concerning the Headteacher.

7. Low level Concerns Reporting Form – Sandy Lane Nursery and Forest School

Your details		
Name		
Role		
Date and time of completing this form		
Details of individual whom the concern is about		
Name		
Role		
Relationship to the individual reporting eg, manager, colleague		
Details of concern		
Please include as much detail as possible. Think about the following: • What behaviour and/or incident are you reporting? • What exactly happened, including the date, time and context if known? • Why does the behaviour and/or incident concern you? • Why do you believe the behaviour and/or incident is not consistent with the Staff Code of Conduct? • Were any children, staff or other adults present? • What action, if any, has already been taken?		
Details of any children or young people involved		
Name(s)		
Next Steps / Additional Information		
Are you willing to meet with the Headteacher and/or DSL to discuss your concern? Please circle as appropriate	Yes	No

Continued overleaf

Please state any other information that you feel is relevant to the processing of this concern.	
Signature	
For use by Headteacher / safeguarding team upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions taken, decision, rationale, outcome and any follow-up. Include consideration of whether the concern forms part of a wider pattern and whether consultation with the LADO or notification to an employer is required.	Actions taken, decision, rationale, outcome and any follow-up. Include consideration of whether the concern forms part of a wider pattern and whether consultation with the LADO or notification to an employer is required.