

LISCARD PRIMARY SCHOOL

LOW-LEVEL CONCERNS ABOUT STAFF POLICY

(Including Supply Staff, Contractors, Volunteers, and Governors)



Policy Operating Period:	September 2026 to September 2027
Adopted by Governing Body:	22 September 2026
Due for Annual Review:	22 September 2027
Policy Authors & Leads:	Jane Fagan (Headteacher) & Marie Caton (Senior Family Support Worker / Deputy DSL)

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1. Rationale and Purpose

This policy forms an integral part of Liscard Primary School’s whole-school approach to safeguarding. It must be read in conjunction with the school’s Child Protection-Safeguarding Policy and Procedure (September 2026), Appendix 3 (Allegations of Abuse Made Against Staff / Those in a Position of Trust), Staff Code of Conduct, Policy for Safer Working Practice, Dignity at Work Policy, and Whistleblowing Policy.

In line with Keeping Children Safe in Education (KCSIE 2026), Working Together to Safeguard Children (2026), and the Children’s Wellbeing and Schools Act 2026; Liscard Primary School is committed to promoting an open, transparent, and vigilant culture (‘it could happen here’). Creating an environment where all concerns about adults working in or on behalf of the school including permanent staff, supply staff, volunteers, contractors, and governors are shared responsibly, recorded accurately, and dealt with promptly is critical to maintaining child safety and professional integrity.

The purpose of this policy is to:

- **Early Identification:** Identify inappropriate, problematic, or concerning behaviour at the earliest possible stage.
- **Boundary Maintenance:** Ensure all adults working in or on behalf of the school understand clear professional boundaries and act consistently with school ethos and values.
- **Empowerment & Open Culture:** Empower staff to self-refer or share low-level safeguarding concerns without fear of reprisal or negative consequences.
- **Early Support & Correction:** Address unprofessional behaviour constructively, supporting individuals to correct conduct before it escalates.
- **Pattern Identification:** Identify patterns of concerning behaviour that may require consultation with, or formal referral to, the Local Authority Designated Officer (LADO).
- **Systemic Improvement:** Help identify and rectify any systemic weaknesses in the school’s safeguarding arrangements.

2. Statutory Framework and Governance Alignment

This policy complies with all relevant national legislation and statutory guidance, including:

- **Keeping Children Safe in Education (KCSIE 2026):** Department for Education statutory guidance for schools and colleges.
- **Working Together to Safeguard Children (2026):** Statutory framework for multi-agency safeguarding and early help.
- **Children’s Wellbeing and Schools Act 2026:** Enhanced oversight, visibility, and safeguarding provisions.
- **Crime and Policing Act 2026:** Legislative provisions regarding safer recruitment and tackling violence.
- **Education Act 2002 (Section 175):** Statutory duty on governing bodies to make arrangements to safeguard and promote child welfare.

- **Data Protection Act 2018 & UK GDPR:** Statutory requirements governing confidential record handling and information sharing.

2.1 Key Safeguarding Contacts

Role	Name	Contact Details
Headteacher & Senior DSL	Jane Fagan	0151 638 3910
Deputy Designated Safeguarding Leads	Marie Caton & Leanne Quarry-Ellis	0151 638 3910
Chair of Governors (Case Manager for HT)	George Lucking	0151 638 3910 (via Business Manager Joanne Johnson)
Nominated Safeguarding Governor	Sarah Brear	0151 638 3910
Local Authority Designated Officer (LADO)	Kevin Dykes	safeguarding@wirral.gov.uk / kevindykes@wirral.gov.uk

3. Clarification: Allegation vs. Low-Level Concern vs. Appropriate Conduct

3.1 Definition of a Low-Level Concern

The term ‘low-level’ concern does not mean that the concern is insignificant. A low-level concern is any concern no matter how small, and even if causing no more than 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:

- **1. Code Breach:** Is inconsistent with the Staff Code of Conduct (including inappropriate conduct outside of work / transferable risk), AND
- **2. Below Harm Threshold:** Does not meet the harm threshold and is not otherwise serious enough to warrant an immediate referral to the LADO.

Low-level concerns can exist on a wide spectrum, from inadvertent or thoughtless behaviour through to conduct that may look inappropriate but might not be in specific circumstances, up to behaviour that is intended to enable abuse.

3.2 Examples of Low-Level Concerns

Examples of low-level concerns include, but are not limited to:

- **Social Contact:** Being over-friendly with children or attempting to establish personal contact on social media.
- **Favouritism:** Showing favouritism or singling out specific children for special privileges or attention.

- **Personal Devices:** Taking photographs or videos of children on personal mobile phones or personal cameras, contrary to school policy.
- **Secluded Engagement:** Engaging with a child on a 1-on-1 basis in a secluded area or behind a closed door without clear educational justification.
- **Inappropriate Language:** Using inappropriate banter, derogatory terms, or sexualised language that crosses professional boundaries.
- **Physical Boundaries:** Failing to adhere to safe-touch guidelines or physical boundary expectations set out in school policy.
- **Belittling Conduct:** Humiliating, belittling, or mockingly addressing pupils.

3.3 The Harm Threshold (Allegations)

A concern moves beyond a low-level concern and meets the harm threshold (governed by Appendix 3 of the Child Protection-Safeguarding Policy) when an adult working in or on behalf of the school has:

- **Harm Caused:** Behaved in a way that has harmed a child, or may have harmed a child; and/or
- **Criminal Offence:** Possibly committed a criminal offence against or related to a child; and/or
- **Risk of Harm:** Behaved towards a child or children in a way that indicates they pose a risk of harm to children; and/or
- **Unsuitability / Transferable Risk:** Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside school posing a transferable risk).

IMMEDIATE ACTION REQUIRED: Mandatory Action for Harm Threshold Cases: Any concern or allegation meeting the harm threshold must be reported to Headteacher Jane Fagan immediately and referred to LADO Kevin Dykes within 24 hours.

3.4 Safeguarding Classification Matrix

Category	Definition & Criteria	Required Action & Pathway
Appropriate & Professional Conduct	Behaviour that accords fully with the Staff Code of Conduct, professional standards, and school values.	No action required. Positive reinforcement of professional standards.
Low-Level Concern	Behaviour inconsistent with Staff Code of Conduct (inc. outside work) but DOES NOT meet harm threshold. Causes nagging doubt or unease.	Report to Jane Fagan, Headteacher without delay. Document on Low-Level Concern Form. Management guidance/support & central log review.
Harm Threshold / Allegation	Adult has harmed/may have harmed a child, committed an offence, poses harm risk, or is unsuitable to work with children.	Report IMMEDIATELY to Jane Fagan, Headteacher. Refer to LADO (Kevin Dykes) within 24 hours. Follow Appendix 3 procedures.

4. Responsibilities of Staff

4.1 Understanding Code of Conduct Expectations: All staff, supply workers, contractors, and volunteers must maintain the highest standards of professional conduct set out in the Liscard Primary School Staff Code of Conduct. Induction for new staff and annual safeguarding refreshers cover these expectations explicitly.

4.2 Duty to Share Concerns Promptly: It is crucial that any concerns in relation to an adult's behaviour, including those that do not meet the harm threshold, are shared responsibly and promptly with the Headteacher. Staff must never assume that someone else will act.

4.3 Encouragement to Self-Refer: Staff are strongly encouraged to self-refer where, for example, they have found themselves in a situation that could be misinterpreted, might appear compromising to others, or where on reflection they believe their behaviour fell below expected professional standards.

4.4 Concerns Regarding the Headteacher: Where a concern or allegation relates to the Headteacher (Jane Fagan), the report must be submitted directly to Chair of Governors George Lucking in a sealed envelope via the school office (ask for Business Manager Joanne Johnson).

5. Reporting Procedures

1. Initial Verbal Sharing: Low-level concerns may be discussed verbally with Headteacher Jane Fagan in the first instance to ensure immediate clarity.

2. Written Record Requirement: Following verbal notification, the concern must be formally recorded in writing using the Low-Level Concern Report Form (stored on the school shared drive).

3. Essential Details Required: The written report must include: (a) name of adult sharing concern, (b) name of adult concern is about, (c) factual account of the concern, (d) context, location, date, and time, and (e) initial actions taken.

4. Anonymity & Confidentiality: The identity of the individual sharing the concern will be recorded. If the individual requests anonymity, this will be respected as far as reasonably possible within safeguarding limits.

6. Responding to and Managing Low-Level Concerns

Upon receipt of a low-level concern report, the Headteacher (or Chair of Governors) will execute the following procedure:

Step 1: Review & Reclassification Check: The Headteacher will satisfy themselves that the concern is low-level and does not meet the harm threshold. If there is a pattern of concerns or additional context that elevates the risk, the matter will be reclassified as a formal allegation and referred to LADO Kevin

Dykes within 24 hours. Where any doubt exists, advice will be sought from the LADO on a 'no-names' basis.

Step 2: Proportionate Evidence Gathering: The Headteacher will gather basic factual information by speaking directly with the referrer (unless anonymous), the individual involved, and any witnesses. All evidence and decision rationales will be formally documented.

Step 3: Third-Party & Supply Notification: If the concern relates to a supply teacher, agency worker, or third-party contractor, the concern will be notified to their employer so that cross-setting patterns of behaviour can be monitored.

Step 4: Supportive & Corrective Management Action: Most low-level concerns will be resolved through sensitive management guidance, reflective discussion, targeted training, or an updated risk assessment. Discussions will clearly state why the conduct was concerning, required behavioural changes, available support, and potential consequences of repeated non-compliance.

7. Storage, Retention, and Pattern Monitoring

7.1 Data Protection & Storage: All low-level concern records will be stored confidentially and securely in accordance with the Data Protection Act 2018 and UK GDPR.

7.2 Central Log & SLT Oversight: A secure central log of all low-level concerns is maintained by the Headteacher. The Senior Leadership Team (SLT) reviews this central log regularly to monitor emerging patterns, evaluate trends, and address setting-wide cultural issues. The outcomes of these regular reviews are formally minuted in SLT meetings where appropriate.

7.3 Personnel Files & Job References Rule: Low-level concern records will NOT be placed on an employee's personnel file, nor mentioned in job references, UNLESS: (a) the concern (or cumulative pattern) is reclassified as a higher-level allegation, or (b) the concern results in formal action under school disciplinary, capability, or grievance procedures.

7.4 Retention Period: Low-level concern records will be retained securely at least for as long as the individual remains employed at Liscard Primary School (or in accordance with national safeguarding retention guidelines).

Low-Level Concerns Report Form

Where a concern or allegation relates to the Headteacher (Jane Fagan): the report must be submitted directly to Chair of Governors George Lucking in a sealed envelope via the school office (ask for Business Manager Joanne Johnson).

Details and context of concern including any actions taken

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Date received by Head Teacher:

Review, Action & Outcome:

(To be completed by the Head Teacher or Nominated Lead)

(Supply Staff & Contractors) Date of external agency notification if applicable:

Anonymised Data & Trend Monitoring:

The governing body will receive anonymised information relating to low-level reported concerns. This will include total numbers of low-level concerns raised, themes, or training actions taken. This allows governors to monitor the safeguarding culture and identify systemic patterns without compromising individual confidentiality or data protection laws.

Appendix A

(<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy/>)

Spectrum of behaviour

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.