



Beachborough School

Safeguarding – Low Level Concerns Policy

Updated: September 2025

Date of next Review: September 2026

Policy Lead: Ms SJ Lapper (Deputy Head Pastoral - DSL)

Reviewed by: Senior Leadership Team and Ed Comms Committee

Reviewed and Ratified by Governors: Annually (Autumn Term Meeting)

Introduction

At Beachborough School, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

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 should inform the Headteacher about their concern using a Low-Level Record of Concern Form. If the Headteacher cannot be contacted, the Deputy Head Pastoral (DSL) should be contacted instead.

Keeping Children Safe in Education September 2025

The following guidance and information is taken from Keeping Children Safe in Education September 2025:

428. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

429. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

430. The term '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 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.
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their 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.

431. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

432. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

433. It is crucial that all low-level concerns are shared responsibly with the right person (the Head), and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

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, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 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 allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

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

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

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or the Deputy Head Pastoral (DSL).

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Beachborough School, 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:

- (a) 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
- (b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

THE ROLE OF STAFF

- Staff are encouraged to report any concerns they have within 24 hours of them first becoming a concern, this can be raised in person with the Head or using the [Low-Level Record of Concerns Form](#).
- If the staff member who raises the concern does not wish to be named, then the school will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary investigation) and for this reason, anonymity will never be promised to members of staff who report low-level concerns. Where possible, staff are encouraged to consent to be named as this will help to create a culture of openness and transparency.
- Staff are given the option of either discussing their low-level concern verbally or providing a written summary of it on the 'Low-Level Concerns Reporting Form' (see Appendix 1). Where the low-level concern is provided verbally, the Head will make a record of the conversation on a 'Low-Level Concerns Reporting Form', either contemporaneously or immediately following the discussion.
- Unless exceptional circumstances apply (for example, providing a copy would create a real risk of harm to any adult or child), the member of staff about whom the concern has been raised should be asked if they would like to see a copy of the record made on conclusion of the case.

REPORTING LOW-LEVEL CONCERNS

- It is important that staff feel comfortable and are clear about, the concept of low-level concerns and that they do not need to be able to determine in each case whether their concern is a low-level concern or if in fact, it is serious enough to consider a referral to the LADO or meets the threshold of an allegation.
- Reporting of a low-level concern is a neutral act and the Head (or in the case of a concern regarding the Head, the Chair of Governors) will determine how best to deal with the matter.
- Where a staff member has a low-level concern about a member of staff, it should be reported to the Head who will determine the next course of action.
- Where the low-level concern raised is about the Head, it should be reported to the Chair of Governors.
- Members of staff can self-refer if they find themselves in a situation which could be misinterpreted or might appear compromising to others or if they have behaved in a manner, on reflection, they consider falls below the standard set out in the Code of Conduct.

RESPONSE TO THE LOW-LEVEL CONCERN

- On receipt of a report of a low-level concern, the Head will speak with the member of staff who has raised the concern, review the nature of the concern, and give consideration as to whether any concerns have been raised about the individual in the past.
- Where the concern is regarded as a Safeguarding issue, the School's 'Safeguarding Policy' and procedures come into action.
- If the concern is established as low-level, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstanding.
- The Head will decide who would be the most appropriate person in the school to deal with the matter. This would normally be the line manager of the individual about whom the concerns have been raised.
- Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any on-going concern and accordingly will not require any further action. Others will be most appropriately dealt with by means of management guidance and/or training.
- In many cases, a low-level concern will simply require a values-based conversation with the individual about whom the concern has been raised to help maintain a positive professional relationship with the member of staff concerned.
- Any such conversation should be recorded and should include being clear with the individual why their behaviour is 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 inappropriate behaviour. On some occasions, ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual and regularly reviewed with them may also be appropriate.

- The Head may determine that some low-level concerns are matters of misconduct or poor performance, in which case, the relevant disciplinary grievance or whistleblowing procedures will be followed. If there is any doubt, the Head will seek advice, including from the LADO, where appropriate

Low Level Concern Form

Please click the link to access the [Low-Level Record of Concern Form](#), this electronic form can also be accessed on the Safeguarding SharePoint site or via the Low-Level Concern Reporting form on the [school website](#). For anyone who does not have access to the electronic form, a hard copy can be collected from the School Office.

Key Reference Document

Beachborough School has used and followed the guidance document provided by Farrer in the production of this Low Level Concerns policy, which is referenced in KCSIE. Further details are available here: [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](#)

This policy applies across the whole school including Boarding and EYFS and will be reviewed and updated regularly. *Linked Policies and read in conjunction with: Safeguarding, Behaviour, Taking and Use of images, Equal Opportunities, Safer Recruitment, Boarding, Staff Code of Conduct.*