Kirby Muxloe Primary School

LOW LEVEL CONCERNS POLICY

Status: Statutory

Date adopted by Trust Board: 28th October 2026

Date for review: Autumn 2027

Statement of intent

At Kirby Muxloe Primary 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. The Headteacher will decide whether the concern has sufficient merit to record using a Low-level Record of Concern Form. They will consider all the facts regarding the concern including where the concern originated. If the Headteacher cannot be contacted or the concern is about the Headteacher, the Trust Lead should be contacted.

This policy applies to all concerns (including allegations) about members of staff, **including supply teachers, trainee teachers, volunteers and contractors**, which do not meet the harm.

Concerns may arise through, for example:
- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

What is a low- level concern?

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 considered 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 - this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils e.g conversations that are about a staff members' personal life or are of a sexual nature;
- having favourites - this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- taking photographs of children on their mobile phone, contrary to school policy.
- covering viewing panels in a classroom against guidance
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or humiliating pupils.

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.

Staff need to be aware that some of the above low-levels concerns may meet the harms threshold depending on certain factors such as the age or needs of the child or the content of the exchanged messages, and that some of the above incidents may not be concerns in context e.g

a pre-approved, one to one meeting with a child behind a closed door between the child and a member of staff, for example an outside counsellor or social worker who has received all appropriate safety checks

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

It is crucial that all low-level concerns are shared responsibly with the right person, 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.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns such as being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

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.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk or harm to children.

Low-level concern

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:
- Is not consistent with the Staff Code of Conduct, and/or
- Relates to their conduct 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.

Appropriate conduct

Behaviour which is entirely consistent with the staff Code of Conduct and the law.

Where concerns are raised directly or indirectly concerning a member of staff but the harm threshold hasn't been met and the Low-level Concerns policy does not strictly apply, the Headteacher or case manager will conduct a risk assessment of the situation and act accordingly. Mitigations regarding the concerns may be agreed with the member of staff and actioned appropriately.

Prevention amongst staff

As a school, we 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, 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 pupil professional

Staff will be aware that where there is any doubt regarding whether the behaviour is appropriate, this should be reported to the Headteacher or DSL immediately.

The Headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort where low-level concerning behaviour is seen more widely.

School culture

We understand that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleague's behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality etc

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

As a school, we will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members.

All staff will read, under and adhere to the appropriate and inappropriate subsection of this policy, as well as the Staff Code of Conduct.

We will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in our school communities, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

Reporting concerns

Staff will report all safeguarding concerns they have to the Headteacher immediately in line with the procedures laid out in the Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff will report their concerns no later than 24 hours after the incident where possible. Staff need to be aware that concerns are still worth reporting even if they do not seem serious.

Staff need to report their concerns concerns to the Headteacher, by the agreed method for example by emailing directly or speaking with them (where it will be recorded) .

Staff may request anonymity when reporting a concern, and the school will endeavor to respect this as far as possible. We cannot, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named e.g where there is necessary for a fair disciplinary hearing. In line with the Whistleblowing policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where the low-level concern relates to the Headteacher, it should be reported to the Trust Chair.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team.

Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:
- Could be misinterpreted
- Could appear compromising to others
- They realise, upon reflection, falls below the standard set out on the Staff Code of Conduct.

We will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Headteacher will, to the best of their ability, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

Responding to low-level concerns

The Headteacher will be the ultimate decision-maker in respect to low-level concerns, although it is recognized that depending on the nature of the concern, the Headteacher may wish to consult with the DSL and take a more collaborative decision-making approach. If concerns relate to the Headteacher then the Trustee Chair should decide on whether the concern is low-level concern or not. Where the Headteacher or DSL is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm

If the concern is raised via a third party, the Headteacher or Trustee Chair will collect evidence where necessary by speaking:
- Directly to the person who raised the concern unless it was raised anonymously
- To the individual involved and any witnesses.

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school Code of Conduct. The person responsible will also ensure:
- Allegations that meet the threshold will be referred to the LADO for advice.
- Low level concerns that the school feel may need further guidance on will be referred to the LADO for advice.
- Low levels concerns that the school feel they can deal with internally will be dealt with in line with other disciplinary policies/code of conduct
- The school will engage with the HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Record keeping

All low- level concerns will be recorded in writing. We will will retain all records of low-level concerns related to their individual schools, including those that were found to be unfounded.

Records will include:
- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

Records will be:
- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold, we will refer it to the designated officer at the local authority
- Low-level concern records will be reviewed collectively, where appropriate, to identify patterns, recurring themes or organisational learning that may indicate emerging safeguarding risks.
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a **supply teacher, trainee teacher or contractor**, we will notify the individual's employer or training provider, as appropriate, so that any potential patterns of inappropriate behaviour can be identified.

Reviewing a low-level concern

Records will be reviewed so that potential patterns concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified the Headteacher or Trustee Chair will decide on the course of action, which may include:

- Disciplinary investigation and/or procedures
- Management Advice, including recommendations for training
- Referral to the LADO (where pattern of behaviour moves from a concern to meeting the harm threshold)

If the concern relates to volunteers, or any other concerns arise, school can contact the LADo for further advice.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the LA and is found to be substantial; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

Low-level Concern record

This document should be used when low-level concerns as defined in Keeping Children Safe in Education 2026 are reported. This document does not replace suspension/formal disciplinary investigations in the event that concerns are either categorised as more serious than low-level or when formal disciplinary procedures are required in relation to the low-level concern.

1. Name of individual raising the concern (leave blank if concern was raised anonymously or the individuals wishes to remain anonymous)	
2. Date the concern was raised	
3. Name and role of individual about whom concern has been raised	
4. Details of the concern(s) reported (give description and context) A 'low- level' concern is any 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 the staff code of conduct but does not meet the allegations threshold set out in this policy.	
5. Details of steps have been taken to investigate this concern Steps should include speaking to the individual who raised the concern, the individual about whom the concern is raised and any witnesses. You will need to review the Employee Code of Conduct and Safeguarding Policies to determine if there has been a breach.	
6. Set out the individual's response to the concern	
7. Is this concern 'low-level' or should it be treated as an allegation against staff and managed in accordance with this policy. To reach this decision, consider the information set out in this policy. If you are unsure, seek advice from HR and/or safeguarding advisors and/or discuss the matter with your LADO. Set out your reasons for reaching your conclusion, including the advice provided by your advisors and any discussions with your LADO	
8.Have 'low-level' or other concerns been raised about this individual previously?	Yes [ ] No [ ]
9. If so, please provides dates, brief details and relevant file/ document reference for the concern(s). Also consider whether previous concern(s) raised coupled with this new concern meet the threshold. Also consider that malicious accusations can be made.	
Details of further action required action could range from no action or a conversation to discuss the concern, to being clear why the behaviour is concerning and formal disciplinary action.	

Completed by	Name	
	Position	

Date		Signature	