St Faith's

Church of England
Infant and Nursery School

Low-level Concerns Policy

"Our inclusive St Faith's family strives to enable all to achieve their full potential and inspire a community of hope and friendship. We seek excellence by ensuring a safe, respectful and flourishing learning community, where differences are celebrated and our genuine love and high expectations make a difference to all."

Oscar Romero …. "Aspire not to have more, but to be more."

As a Church School, the distinctive Christian values of respect, compassion, trust, justice, friendship and community are promoted through the experiences we offer to all our pupils, to give pupils the knowledge, skills and understanding that they require to lead confident, healthy and independent lives. We promote the teaching and understanding of fundamental British values in order to prepare pupils for life in modern Britain. We positively teach the values of democracy, the rule of law, individual liberty, mutual respect for and tolerance of those with different faiths and beliefs and for those without faith. Teaching the fundamental British values helps the children to become informed, active and responsible citizens.

This policy outlines the purpose, nature and management of **low-level concerns** in our school. It reflects the consensus of opinion of all members of staff. It is based on current practice and has the full agreement of the governing body. The implementation of this policy is the responsibility of the Head teacher, teaching staff and support staff. It is our collective responsibility to raise awareness and that all policies are known, understood and used in an appropriate way.

Rationale

This policy should be read in conjunction with the School's Safeguarding Policy and Procedures, Staff Code of Conduct and Whistleblowing Policy, to enable staff to share their concerns, no matter how small, about their own or another member of staff's behaviour.

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the school's Code of Conduct are constantly lived, monitored and reinforced by all staff. The school deals with all concerns about adults working in or behalf of the school appropriately and promptly.

Introduction

This policy seeks to:

- ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines.
- empower staff to share any low-level concerns with the Headteacher.
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage.
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO.
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised.
- help identify any weaknesses in the organisation's safeguarding system.

Keeping Children Safe in Education September 2026

The following is taken from Keeping Children Safe in Education September 2026:

434. Schools and colleges should have their own procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges in a paid or unpaid capacity, i.e. members of staff, including supply teachers, trainee teachers, volunteers and contractors.

435. This part of the guidance has two sections covering the two levels of concerns and allegations:

1. Concerns / allegations that may meet the harm threshold.
2. Concerns / allegations that do not meet the harm threshold – referred to for the purposes of this guidance as 'low-level concerns'.

436. These procedures should be consistent with local safeguarding procedures and practice guidance.

Section 2 of Keeping Children Safe in Education September 2026 relates to Low Level Concerns:

Section two: Concerns or allegations that do not meet the harm threshold

506. Governing bodies and proprietors should have policies and processes to deal with any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

Low-level concerns

507. 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.

508. 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 121 accordance with the ethos and values of the institution.

What a low-level concern is

509. The term 'low-level' concern does not mean that it is insignificant. A lowlevel 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, and
• 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 overfriendly 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.

Pages 120 – 124 of Keeping Children Safe in Education September 2026 offer further detail.

Responsibilities of staff

It is important that **all** staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct.

It is crucial that **any** concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headteacher. This should be done without delay. It is crucial that we have created a culture where any boundary violations are shared and acted upon.

Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors (whose contact details can be found in the School's Safeguarding Policy document).

Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. KCSIE 2026
This is done through honest dialogue, our strong culture of safeguarding and strong, open relationships. Low level concerns may be discussed at Safeguarding Meetings, Senior Leadership meetings and staff meetings.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct
Allegation:
Behaviour that indicates that an adult who works with children has:

- Behaved in a way that has harmed a child, or that may harm a child;
- Possibly committed a criminal offence against, or in relation to a child;
- Behaved towards a child or children that indicates that may pose a risk of 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 an organisation's 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 that is entirely consistent with the organisation's Code of Conduct, and the law.

Storing and use of Low-Level Concerns and follow-up information
Low-Level Concern recording 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 those aware in the senior leadership team.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. KCSIE 2026.

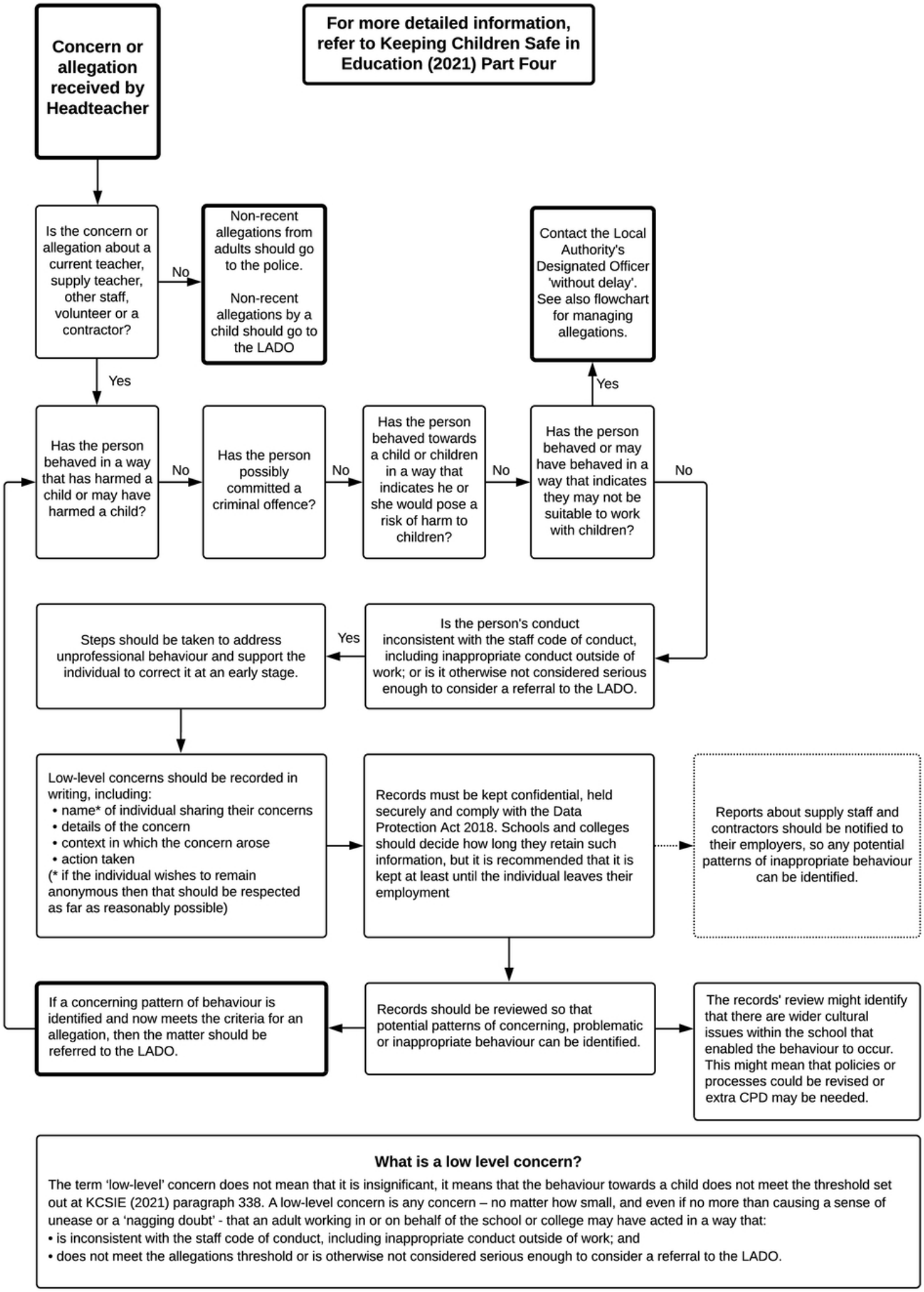
Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures. Whenever staff leave St Faith's, any record of low-level concerns which are stored about them will be reviewed as to whether or 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.

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part four, Section one KCSIE 2026.). Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again. KCSIE 2026.

Safeguarding procedures

At St Faith's we have a positive culture of safeguarding, with effective policies and procedures in place. Our safeguarding procedures are outlined in our Child Protection and Safeguarding Policy, which can be found on our website https://stfaithscofe.secure-primarysite.net/safeguarding-information-and-policies/.

Approved by the governing body on	March 2025
Signed (Chair of Governors)	Dave Vincent
Signed (Headteacher)	Amanda Konrath
Review Date	March 2027

Process to follow when a Low-Level Concern is raised