LOW LEVEL CONCERNS POLICY

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1. Introduction

At Froebel House 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 setting, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding any low-level concerns they may have.

2. Keeping children safe in education 2026 Statutory guidance for schools and colleges - 2026

'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).

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

If implemented correctly, this should:

‘enable settings to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse and ensure that adults working in or on behalf of the setting are clear about the professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.’ (Farrer & Co)

3. Definition

Definition: 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 an organisation’s staff code of conduct, including inappropriate conduct outside work.
- Does not meet the harm threshold; or is otherwise not serious enough to merit 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
- humiliating children

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.

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 the setting from potential false allegations or misunderstandings.

4. Implementing the Policy

Staff must be fully notified of the low-level concerns policy and of its purpose, partly for its proper implementation but also under the data protection principles of fairness and transparency. As a general rule, if the policy is being applied correctly, staff should not be in the dark about either the existence or the nature of a low-level concern about them. Reference to a low-level concerns policy should be made in any privacy notice to staff. (Farrer & Co 2022 7.7).

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

Low Level Concerns forms, and follow-up information will be stored securely within the settings safeguarding systems. This will be stored in accordance with the settings GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share the concern with other apart from the Designated Safeguarding Lead/Manager, Deputy or Committee Chair if applicable.

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 the setting 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.

6. Self-reporting

Staff should wherever possible, proactively self report – for example, if they know they are going to be in a situation which would be deemed a breach of the staff code of conduct, including, for example where a member of staff

(i) Plays an external sports team with family members of children who attend the setting and they may be on a WhatsApp group with them, where potentially photographs and information could be shared
(ii) Is having to drive a child somewhere – for example for an urgent medical appointment
(iii) If behaviour has been managed in a way that is not in accordance with the settings Behaviour and Code of Conduct Policy.

7. Procedure

A member of staff who has a concern about another member of staff should inform their Designated Safeguarding Lead about their concern using a Low-Level Record of Concern Form(example attached).

If the Designated Safeguarding Lead/Manager cannot be contacted, then the Deputy Designated Safeguarding Lead or if applicable the Chair of the Governing Committee should be contacted instead. Steps should be taken to address the unprofessional behaviour and support the individual to correct it an early stage.

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.

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment

If the individual raising the concern wishes to remain anonymous then that should be respected as far as possible. However, there may be circumstances where the staff member will need to be named and for this reason, anonymity should never be promised to those sharing low level concerns.

8. Responding to low-level concerns

The school or college low-level concerns policy should set out the procedure for responding to reports of low-level concerns. If the concern has been raised via a third party, the headteacher/principal (or a nominated deputy) should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

References

DfE: Keeping children safe in education 2026 Statutory guidance for schools and colleges - 2026

Developing a Low-Level Concerns Policy. Farrer & Co 2022

low-level concern. It can be saved securely once completed.

LOW-LEVEL CONCERN REPORTING FORM

(For completion by the person raising the concern or the DSL/Headteacher receiving it)

Section A – Staff Member Raising the Concern

Name:	
Role:	
Date of Concern:	
Contact details (if not anonymous):	

Section B – About the Concern

Name of person the concern is about:	
Role of the person the concern is about (e.g. teacher, TA, volunteer, supply):	
Date the concern occurred (if different):	
Location (if applicable):	

Please describe the concern, including as much factual detail as possible (e.g. what was observed or heard, and the context): *Include who was involved, what was said/done, when and where it happened.*

Section C – Immediate Action Taken (if any):

Was anyone spoken to?	☐ Yes ☐ No
If yes, who and when?	
Immediate steps taken by the reporting person (if applicable):	

Section D – Reporting and Review

Date concern shared with DSL/Headteacher:	
Name of person who received the concern:	
Summary of initial response or action taken:	

Section E – Decision-Making (to be completed by DSL/Headteacher)

Was the behaviour categorised as:

☐ Appropriate

☐ Low-level concern

☐ Meets harm threshold (refer to LADO)

Rationale for decision:	
Further action taken (e.g. discussion, training, supervision, informal warning):	
Any patterns or repeat concerns identified?	☐ Yes ☐ No
Does the concern need to be escalated to LADO or through disciplinary routes?	☐ Yes ☐ No
Decision-maker name:	
Signature:	
Date:	

Confidential – To be stored securely and in accordance with data protection law