POLICY DOCUMENT

Low-Level Concerns Policy

Princess May Primary School's approach to low-level concerns — 2026–2027

Governing Body Representative (GBR)	Kristofer McGhee (Chair of Governors)
Signed by (GBR)	……
Date approved	4 September 2026
Next review due by	September 2027
Related policies	Safeguarding and Child Protection Policy; Staff Code of Conduct; Whistleblowing Policy; Guidance for Schools on Dealing with Allegations of Abuse Against Staff and Volunteers
Aligned to	Keeping Children Safe in Education 2026 (in force from 1 September 2026), Part Four; Working Together to Safeguard Children (2026); the Crime and Policing Act 2026, including its mandatory duty to report child sexual abuse, which is not yet in force; and the NSPCC's guidance, Responding to Low-Level Concerns About Adults Working in Education

1. Rationale and aims

This policy should be read alongside our Safeguarding and Child Protection Policy, Staff Code of Conduct, Guidance for Schools on Dealing with Allegations of Abuse Against Staff and Volunteers, and Whistleblowing Policy, to enable staff to share their concerns, no matter how small, about their own or another adult's behaviour.

The purpose of this policy is to create and embed a culture of openness, trust and transparency, in which the clear values and expected behaviour set out in our Staff Code of Conduct are constantly lived, monitored and reinforced by all staff. The school deals with all concerns about adults working in or on behalf of the school appropriately and promptly, and seeks to create an environment where staff are encouraged and feel confident to self-refer — for example, where they have found themselves in a situation that could be misinterpreted, might appear compromising to others, or which, on reflection, they believe fell below expected professional standards.

This policy seeks to:

- ensure staff are clear about, and confident to distinguish between, expected and appropriate behaviour and concerning, problematic or inappropriate behaviour, in themselves and others, including professional boundaries and reporting;
- empower staff to share any low-level concern with the Headteacher or the Designated Safeguarding Lead (DSL), Hannah Blunden, Assistant Headteacher;
- help staff address unprofessional behaviour, and help the individual correct it at an early stage;
- identify concerning, problematic or inappropriate behaviour, including any patterns, that may need to be consulted on, on a no-names basis if appropriate, or referred to the LADO;
- provide for the responsive, sensitive and proportionate handling of concerns when they are raised; and
- help identify any weaknesses in our safeguarding systems.

This policy applies to all staff at Princess May Primary School, including supply staff, trainee teachers, volunteers and contractors.

2. Legislation and guidance

This policy is based on Keeping Children Safe in Education 2026 (in force from 1 September 2026), Part Four, and has regard to Working Together to Safeguard Children (2026) and the NSPCC's guidance, Responding to Low-Level Concerns About Adults Working in Education. It should also be read alongside the Crime and Policing Act 2026, which will introduce a mandatory duty for staff in regulated activity to report child sexual abuse to the police or the local authority. The duty is not yet in force and is not expected to commence before 29 April 2027. In our school, staff report any such concern to the DSL, in the same way as any other safeguarding concern that meets the harm threshold.

3. Defining a low-level concern

A low-level concern is one that does not meet the harm threshold set out in our Safeguarding and Child Protection Policy (see Keeping Children Safe in Education 2026, Part One: what school and college staff should do if they have a safeguarding concern or an allegation about another staff member). That is, when anyone working in or on behalf of the school, including volunteers, supply staff, trainee teachers and contractors, 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 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, including behaviour that may have happened outside school and which poses a transferable risk to children.

Where behaviour may meet this harm threshold, this should be reported to the Headteacher without delay, and dealt with under our Safeguarding and Child Protection Policy — see ‘Allegations regarding person(s) working in or on behalf of the school’ and ‘Initial action by the person receiving or identifying an allegation or concern’.

A low-level concern is any concern — no matter how small, and even if 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:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold, or is otherwise not considered serious enough to warrant 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 a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area, or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.

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

4. Responsibilities of staff

It is important that all staff are clear about the expectations set out in the Staff Code of Conduct; this is covered annually by the DSL, and as part of induction for new staff.

Any concern about a staff member’s behaviour, including one that does not meet the harm threshold, must be shared responsibly with the Headteacher or the DSL, and without delay. Where there is a concern or allegation about the Headteacher, this should be referred to the Chair of Governors, whose contact details can be found in our Safeguarding and Child Protection Policy.

A staff member who is concerned about how their own behaviour may have been interpreted, or who, on reflection, believes their behaviour may have been contrary to the Staff Code of Conduct, should self-refer to the Headteacher or the DSL.

5. Dealing with a low-level concern

A low-level concern may be shared verbally with the Headteacher or the DSL in the first instance, but must then be recorded in writing. The record should include:

- details of the concern;
- the context in which the concern arose; and
- the action taken.

The name of the individual sharing the concern should also be noted, but if they wish to remain anonymous, this should be respected as far as reasonably possible. Where a concern is shared verbally, the Headteacher or the DSL should make an appropriate record of the conversation, either at the time or immediately afterwards, covering the details above; records will be signed, timed and dated, and kept confidential in line with our data protection policies and UK GDPR.

6. Responding to a low-level concern

The Headteacher will first satisfy themselves that a concern is genuinely low-level, and should not be reclassified as a higher-level concern or allegation and dealt with under the appropriate procedure. A low-level concern might be reclassified where:

- the threshold for a higher-level concern or allegation is met;
- there is a pattern of low-level concerns which, taken together, amount to a higher-level concern or allegation; or
- other information, taken into account, leads to a higher-level concern or allegation.

In line with Keeping Children Safe in Education 2026, the Headteacher considers, at the point a concern is first raised, whether a referral to the LADO is appropriate, even where the concern appears to be low-level; where the Headteacher is in any doubt, advice will be sought from the LADO, if necessary on a no-names basis.

Having established that a concern is low-level, the Headteacher will discuss it with the individual who raised it, and take any other steps needed to investigate it. Where a concern has been raised via a third party, the Headteacher should gather as much information as possible by speaking directly to the person who raised it, unless it was raised anonymously, and to the individual involved and any witnesses. This information helps categorise the behaviour and decide what further action, if any, is needed; all of this is recorded, along with the rationale for any decisions and the action taken. Reports about supply staff or contractors are notified to their employer, so that any pattern of concerning behaviour can be identified.

Most low-level concerns are, by their nature, minor, and are dealt with through management guidance or training, approached in a sensitive and proportionate way; in many cases, this will simply mean a conversation with the individual concerned. Details of the concern, and the rationale for decisions and action taken, are recorded.

Any conversation with a staff member following a concern will be clear about why their behaviour is considered concerning, problematic or inappropriate, what change is required, what support they might need to achieve and maintain that change, and the consequences of failing to reach the required standard or repeating the behaviour. Ongoing, transparent monitoring of the individual's behaviour may be appropriate, and an action plan or risk assessment may be required. Some concerns may trigger our disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate; others may relate to performance management, where advice may be sought from the school's HR manager.

7. Monitoring of low-level concerns

The Headteacher will securely retain confidential files on low-level concerns. A central log is shared with, and monitored by, the Senior Leadership Team on a monthly basis, to ensure all such concerns are dealt with promptly and appropriately, and that any pattern of concerning, problematic or inappropriate behaviour is identified; a record of this review is kept in SLT minutes.

No record is made of a low-level concern on an individual's personnel file, and no mention is made in job references, unless either:

- the concern, or group of concerns, has been reclassified as a higher-level concern; or
- the concern, or group of concerns, is sufficiently serious to result in formal action under our grievance, capability or disciplinary procedures.

8. Links to other policies

- Safeguarding and Child Protection Policy;
- Staff Code of Conduct;
- Guidance for Schools on Dealing with Allegations of Abuse Against Staff and Volunteers; and
- Whistleblowing Policy.

Annex A: How to categorise and report a concern

Use this table to help decide which route applies. If in doubt, speak to the DSL or Headteacher — it is always better to raise something than to stay silent.

Concern related to a child	Low-level concern about an adult	Allegation about an adult
Any concern that a child is suffering, or is likely to suffer, harm or abuse, or another specific safeguarding issue.	Any concern that an adult may have acted in a way that is not consistent with the Staff Code of Conduct, or relates to conduct outside work that has caused a sense of unease about their suitability to work with children.	Behaviour indicating an adult has harmed a child, or may have harmed a child, or behaved towards a child in a way that indicates they pose a risk of harm to children.
• Follow our Safeguarding and Child Protection Policy and contact the DSL, or, in their absence, the Deputy DSL. • Where there is a risk of immediate serious harm to a child, a referral is made to children's social care immediately.	Notify the Headteacher or the DSL, in line with Section 5 of this policy.	Notify the Headteacher, in line with our Safeguarding and Child Protection Policy.