



RED LANE PRIMARY SCHOOL  
LOW LEVEL CONCERNS  
POLICY AND PROCEDURES

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## **1. Aim**

At Red Lane we aim to create and embed a culture of openness, trust and transparency in 100 which the school's or college's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff and volunteers.

## **Introduction**

Red Lane Primary School strives to ensure that all students remain safe and free from harm and we are committed to playing a full and active part in the Multi-Agency response to Child Protection concerns. We opt to taking a whole school approach in meeting the safeguarding needs of our pupils. We aim to do this by following procedures that allow us to ultimately keep our children protected and safe in accordance to the *Keeping Children Safe in Education 2022* guidance.

In doing so, we are aware as adults working within a school environment alongside children, the obligation to report any allegations applies to each member of staff within Red Lane.

*Keeping Children Safe in Education* (September 2022) states that if staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then procedures need to be in place in order to safeguard our pupils. This policy sets out the detail and processes for staff regarding any low-level concerns they may have.

## **2. Safeguarding**

Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional and sexual abuse, and neglect.

Staff will familiarise themselves with each school's safeguarding policy and procedures and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child. Each school's safeguarding policy and procedures are available in the staff room and on the school system. New staff will also be given copies and briefing as part of their induction.

## **3. Staff-pupil relationships**

Staff will observe proper boundaries with pupils that are appropriate to their professional position. They will act in a fair and transparent way that would not lead anyone to reasonably assume they are not doing so.

If staff members and pupils must spend time on a one-to-one basis, staff will ensure that:

- This takes place in a public place that others can access
- Others can see in to the room
- A colleague or line manager knows this is taking place
- Contact with pupils outside of school hours is avoided
- Personal contact details are not be exchanged between staff and pupils. This includes social media profiles
- They do no behave in a way which encourages unnecessary contact or attention from individuals or groups unless it is necessary

While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are not acceptable unless these are to a whole group. If in any doubt, staff should seek permission from the Head of School.

If a staff member is concerned at any point that an interaction between themselves and a pupil may be misinterpreted, this should be reported to the Head of School

#### **4. Allegations procedure**

It may be possible that a member of staff acts in a way that does not cause any significant harm or cause any risk to children, but nonetheless is inappropriate. A member of staff who has a concern about another staff member, which does not meet the threshold for significant harm, should always inform the Designated Safeguarding Lead of their concern using a Low-Level Record of Concern form. If the DSL cannot be contacted, the headteacher instead.

#### **5. Reporting allegations according to Keeping Children safe in Education September 2022**

***What school and college staff should do if they have a safeguarding concern or an allegation about another staff member?***

*71. Schools and colleges should have processes and procedures in place to manage any safeguarding allegation, or concern (no matter how small), about staff members (including supply staff, volunteers, and contractors).*

*72. If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then: • this should be referred to the headteacher or principal*

*- Where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school, and*

*- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs). Details of your local LADO should be easily accessible on your local authority's website.*

*73. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy. Further details can be found in Part four of this guidance*

As a school Red Lane have set processes to follow when any allegation is made, however the purpose of this policy is to explore what happens when a low-level concern happens. In safeguarding, we do not like to think of anything as 'low-level' so using the term does not mean these types of concerns are insignificant.

#### **6. What is a low-level concern? – Keeping Children Safe in Education (2022)**

*It 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 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 pupils.***

*426. 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.*

*427. 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.*

*428. 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.*

### **7. Sharing low-level concerns – Keeping Children Safe in Education (2023)**

*432. Schools and colleges should ensure that their low-level concerns policy contains a procedure for sharing confidentially such concerns which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values guardian/safeguarding champion)), or with the headteacher/principal is a matter for the school or college to decide. If the former, then the DSL should inform the headteacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The headteacher/principal should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher/principal may wish to consult with the DSL and take a more collaborative decision making approach.*

*433. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. 434. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO. 101*

*435. 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. Recording low-level concerns*

436. 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.

437. 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).

438. Records should be reviewed so that potential patterns of concerning, 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). 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.

439. 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. References

440. Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding concerns/allegations that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference. Responding to low-level concerns

441. 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.

442. 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.

## 8. Allegation Vs Low-level Concern

### 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 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 which is entirely consistent with the organisation's Code of Conduct, and the law.

More information on Low-level concerns can be found;

[Keeping children safe in education 2022 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

[Responding to low-level concerns in education | NSPCC Learning](#)

## 9. Reporting Low-level concerns at Red Lane Primary

If any member of staff wishes to report a low-level concern about a member of staff they must seek out the Designated Safeguarding Lead or Headteacher as soon as possible. There is also a form which must be completed to report the concern and for the purpose of record keeping.

Staff can find this form;

- *Staffroom*
- *The Office*
- *On the School ICT system*



### LOW-LEVEL RECORD OF CONCERN

Please use this form to share **any concern** – no matter how small, and even if no more than a 'nagging doubt' – if an adult may have acted in a manner which:

- **Is not consistent** with the Red Lane Primary and BASE Academy Trust 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.

You should provide a **concise record** – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be **signed timed and dated**.

**Statement of Staff Commitment to the School's Low-level Concerns Policy**

**To be completed annually BY ALL STAFF and kept in Personnel Files**

Staff Member:..... Post:.....

Line Manager: .....

I have read and understood the standards and guidelines outlined in the Red Lane Primary School Low-level concern policy.

I agree with the principles contained therein and accept the importance of implementing the policies and practices whilst working at Red Lane School.

I confirm that I have:

- Read the Low-level Concerns Policy.
- Had the opportunity to discuss the policy and procedure with my Line Manager.
- Understand the process to report any low-level concerns moving forward.

Signed (Staff).....

Signed (Line Manager).....

Date .....