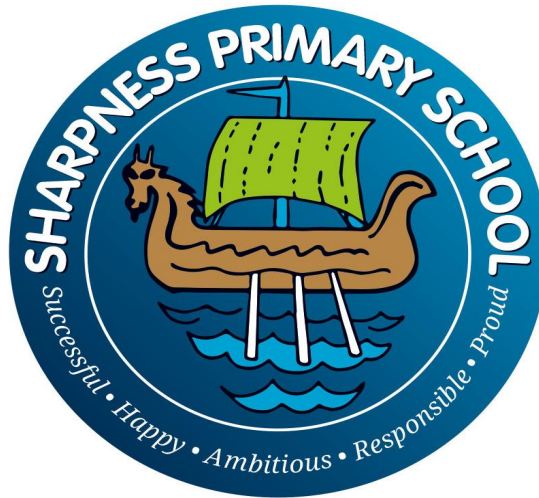




SHARPNESS PRIMARY SCHOOL

Low-Level Concerns Policy



Approved by:	Miss H Buckingham, Headteacher Mrs Sara Matthews, Chair of Governors	Date: 15/10/2025
Last reviewed:	October 2024	
Next review due by:	October 2026	



Introduction

At Sharpness 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 details and processes for staff regarding low-level concerns they may have.

Concerns that do not meet the harm threshold

This policy applies to all concerns about members of staff, including supply teachers, volunteers and contractors, which do **not** meet the harm threshold set out in Part 4 (section 2) of Keeping Children Safe in Education (KCSiE) 2025.

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.

Clarity around Allegation versus Low-Level Concerns

Allegation

Allegation that a member of staff, supply teacher, volunteer or contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicated they may pose a risk of harm to children. and/or
- Behaved or may have behaved in a way indicated they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

Low -Level Concerns

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 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 consider a referral to the Local Authority Designated Officer (LADO)



Examples of Low-Level Concerns (KCSiE 2025)

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing Low-Level Concerns

Any low-level concerns should be reported to the Headteacher in writing by either completing a Low-Level Concern Form (see Appendix A) which can be found in the staff room, or by recording the concern on *Confide*. If the concern is about the Headteacher, then the concern should be reported to the Chair of Governors via email chair@sharpness.gloucs.sch.uk

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.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to Low-Level Concerns

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been 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's Staff Code of Conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with a deputy DSL. All concerns will be logged on *Confide*. Where it is apparent that low-level concerns have escalated or a pattern emerges, the Headteacher will consult with the LADO for advice.



Record Keeping

In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

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 harms threshold as described in section 1 of this appendix, we will refer it to the LADO
- Retained at least until the individual leaves employment at the school

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

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 local authority and is found to be substantiated; 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

Links to Other Policies / Documentation

Safeguarding and Child Protection
Code of Conduct
Whistleblowing
Online Safety
Data Protection
Visitor's Code of Conduct



Sharpness Primary School - Low Level Concern Form	
Name	
Role	
Date and time of completing this form	
Details of individual (including yourself for self-reporting) whom the concern is about	
Name	
Role	
Details of concern	
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	
Details of any children or young people involved	
Name	
For use by HT upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Actions to be taken and follow-up.	