



LOW LEVEL CONCERN POLICY

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1. INTRODUCTION

The Trust and its schools have a statutory duty to safeguard and promote the welfare of children. This Low-Level Concerns Procedure supports compliance with Keeping Children Safe in Education (KCSIE) 2025 and forms part of the Trust's culture of openness, vigilance, and accountability.

This procedure sets out how low-level safeguarding concerns about adult conduct should be reported, recorded, monitored, and escalated when necessary.

2. PURPOSE

The purpose of this procedure is to:

- Promote a culture where all staff feel confident to report any concern, however small.
- Ensure the welfare and interests of children remain paramount.
- Identify, record, and respond to concerning, problematic, or inappropriate behaviour early.
- Support staff to distinguish between expected, concerning, and unacceptable behaviour.
- Provide proportionate, consistent, and fair handling of all low-level concerns.
- Strengthen safer working practices across the Trust.

This procedure applies to all Trustees, Central Team, governors, leaders, staff, contractors, visitors, and volunteers.

3. DEFINITIONS

3.1 What is an Allegation?

An allegation is where it is alleged that a person who works with children has:

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm.
- Behaved in a way in their personal life that raises safeguarding concerns.
- Behaved in a way that indicates they may not be suitable to work with children.

Concerns of this type must be reported in line with the Allegations Against Staff Procedure and/or the Trust's Whistleblowing Policy.

3.2 WHAT IS A LOW-LEVEL CONCERN?

A low-level concern is any concern—no matter how small, including a 'nagging doubt'—that an adult working with children may have acted in a manner that:

- Is inconsistent with the Trust's Child Protection Policy.
- Breaches the Trust's Code of Conduct or safer working practices.
- Is inconsistent with the Trust's ethos or values.
- Relates to out-of-work conduct that raises unease about suitability to work with children.

Examples include:

- Being overly familiar or having 'favourites'.
- Being alone with a child in an isolated location.
- Using personal mobile devices improperly.
- Using inappropriate or sexualised language.
- Poor professional boundaries.

These examples are *not exhaustive*.

4. WHAT TO DO IF YOU HAVE A LOW-LEVEL CONCERN

All concerns must be reported immediately and without delay to the appropriate person:

- Headteacher (default reporting route)
- If the concern is about the Headteacher → Deputy CEO or CEO

- If the concern is about a Central Team member → Deputy CEO or CEO
- If the concern is about the Deputy CEO → CEO
- If the concern is about the CEO → Chair of Trustees
- If the concern is about a Trustee → Company Secretary (Schofield Sweeney)

Staff must not wait until the end of the day to report a concern. It must be shared at the earliest possible moment.

Concerns must not be self-assessed or dismissed by staff.

Staff must not investigate, question the child or adult involved, or attempt to gather evidence. Their role is to report only.

5. TRUST PROCEDURE FOR MANAGING A LOW-LEVEL CONCERN

Step 1 – Initial Concern Raised

- Staff share the concern verbally as soon as it arises.
- A written summary is completed using the Trust's template (Appendix 1).
- Records must include brief context, concise details, dates/times, and signatures.

Step 2 – Review by the Headteacher (or Other Recipient)

The Headteacher will:

- Clarify details with the person reporting.
- Review any previous concerns.
- Determine whether the behaviour is:
 - Consistent with safeguarding policies and safer working practice;
 - A low-level concern;
 - A breach requiring managerial action, training, or guidance;
 - Serious enough to escalate as a potential allegation to LADO or the Trust.

If unsure, the Headteacher must consult the Deputy CEO/CEO or LADO.

Step 3 – Decision-Making and Action

If the behaviour is consistent with expectations:

- Individual is informed and able to respond.
- Feedback provided to reporting staff.
- Policies, training, or systems reviewed if repeated misunderstandings occur.

Staff are encouraged to self-refer if they recognise that their own conduct may have been unwise, poorly judged, or could be misinterpreted.

Malicious or deliberately false reports will be addressed under the Trust's disciplinary or conduct procedures

If the behaviour is inconsistent or concerning:

- Sensitive and proportionate discussion with the individual.
- Guidance, support, or training may be provided.
- Further evidence reviewed to confirm whether threshold for allegation is met.
- If threshold is met, referral to LADO and escalation under Allegations Procedures.

HR will be consulted where appropriate to ensure decisions are fair, consistent, and compliant with employment law.

Individuals subject to a low-level concern will be offered appropriate pastoral and professional support.

If previous concerns exist:

- The Deputy CEO/CEO must be consulted.

- Concerns may be reclassified as a more serious concern.

Step 4 – Formal Recording

All low-level concerns will be recorded:

- Using the Trust template.
- On CPOMS.
- In the individual's personnel file (confidential).
- A copy will be provided to the individual.

6. CONFIDENTIALITY, DATA PROTECTION & RETENTION

- All records will be stored securely, with restricted access.
- Lawful basis: Legal obligation and Legitimate interests.
- Records will be retained in accordance with the Trust's Personnel File Retention Schedule (normally length of employment + 6 years).
- Staff may access their own record; parents/pupils do not have access.
- Information is shared strictly on a need-to-know basis.

Where concerns are referred to LADO or another statutory agency, records may be retained beyond standard retention periods if required by law or safeguarding guidance.

7. GOVERNANCE & OVERSIGHT

- The Trust Board has ultimate accountability.
- Local Academy Boards monitor safeguarding culture, but do not investigate concerns.
- Reports on patterns or themes will be provided (no identifying information).
- Internal Audit may review compliance annually.

8. LINKS TO OTHER POLICIES

This procedure must be read alongside:

- Child Protection & Safeguarding Policy
- Code of Conduct / Safer Working Practice
- Allegations Against Staff (LADO) Procedure
- Whistleblowing Policy
- Disciplinary Policy
- Data Protection Policy

APPENDIX 1 – LOW-LEVEL CONCERN RECORDING TEMPLATE

Name of Individual Concerned:

Date Concern Reported:

Name of Reporter:

Statement of Concern (who, what, when, where):

Statement from Individual Concerned:

Record of Discussion with Individual and Headteacher:

Were previous concerns reviewed? Yes/No

If yes, summary of discussion and actions (DoE/CEO/LADO consulted):

Agreed Action:

Signed (Individual Concerned): Date:

Signed (Headteacher): Date: