



Bishop Luffa Learning Partnership

Rooted in Love, Together we Flourish

Staff Low-Level Concerns Policy

Type of Policy	Tick
BLLP Statutory Policy	✓
BLLP Statutory Primary Policy	
BLLP Model Optional Policy	
Local School Policy	

Lavant School
Part of the Bishop Luffa Learning Partnership
Staff Low-Level Concerns Policy

Contents

1. Introduction
2. Summary
3. Keeping Children Safe in Education September 2026
4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct
5. Storing and use of Low-Level Concerns and follow-up information
6. Process to follow when a Low-Level Concern is raised
7. Key Reference Document
8. Low Level Concern Form

1. Introduction

Bishop Luffa school takes 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.

2. Summary

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using a Low-Level Record of Concern Form (section 8). If the Head Teacher cannot be contacted, a Deputy Head should be informed. If neither the Head or the Deputies are available the Chair of Governors should be contacted instead.

3. Keeping Children Safe in Education September 2026

The following is taken from Keeping Children Safe in Education September 2026:

504. 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.

505. 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.

What a low-level concern is

506. 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 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 children.

507. 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.

508. 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.

509. 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.

4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

An allegation is a serious claim that harm, abuse, or neglect has occurred, while a low-level concern is a less serious concern that doesn't necessarily meet the threshold for an allegation, but still warrants attention, and appropriate conduct refers to behavior that is in line with established standards and expectations.

1. Allegation:

Definition: An allegation is a claim or accusation that harm, abuse, or neglect has taken place.

Threshold: An allegation suggests that one or more children has or may have been harmed, or that the alleged behavior indicates the individual may pose a risk of harm to children.

Examples: A child reporting being physically hurt by a staff member, or a staff member being accused of making inappropriate sexual comments to a child.

2. Low-Level Concern:

Definition: A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is not consistent with the code of conduct or that has caused a sense of unease, but does not necessarily meet the threshold for an allegation.

Threshold: A low-level concern may not meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Examples: A staff member connecting with a child on social media, or a staff member having favorites when working with children.

Importance: Even though it's a low-level concern, it's important to report it, as a series of low-level concerns may indicate a pattern of inappropriate behavior that could lead to an allegation.

3. Appropriate Conduct:

Definition: Appropriate conduct refers to behavior that is in line with established standards and expectations, and does not raise any concerns about the safety or well-being of children.

Examples: A staff member interacting with children in a respectful and professional manner, or a staff member following the school's policies and procedures.

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

Low-Level Concern forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the leadership team. This will be stored in accordance with the school's GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team. 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 Bishop Luffa School, 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.

**For more detailed information, refer to Keeping Children Safe in Education
(2026) Part Four**

6. Process to follow when a Low-Level Concern is raised

Read this document for further information about Low-Level Concerns, which is referenced in KCSIE 2026.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/developing-and-implementing-a-low-level-concerns-policy.pdf>

8. Low Level Concern Form

Low Level Concern Form
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This form can be used to share any concern with the Headteacher / DSL, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incidents. (Continue on separate sheets as necessary). The form should be signed, times and dated.

Details of CONCERN:

Name of Staff member:

Department and Role:

Signed:

Time and Date:

Received by:

At [time]:

Date:

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO ☐ - Give a brief but valid reason/explanation for not

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN:

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : ☐ No : ☐

Signed:

Dated:

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

Below to be used if this becomes a separate policy

Policy Review Date:

Reviewed by:

Next Review Date: