



The Oak Partnership

Low-Level Concerns Policy

Version 3

We are committed to safeguarding and ensuring the health, safety and well-being of all pupils in accordance with safeguarding procedures and guidance for staff outlined in the schools' Health and Safety, Child Protection, Security and Safeguarding policies.

Low- Level Concerns

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3.0	September 2025	COO and Trust Safeguarding Lead	Scope edited to make clear relates to concerns inside and outside of work. Examples in section 3 updated in line with KCSIE 2025. Section 4 updated to include reference to supply staff and contractors. Links to HR policies made clearer.

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1. Introduction

The Oak Partnership 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 and Trust, including the Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

This policy has been written with reference to Keeping Children Safe in Education 2025.

2. Summary and Scope

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate.

This policy **does not cover allegations against adults that have reached the serious harm threshold** and need referring to the Local Authority Designated Officer (LADO). This is covered in the TOP Child Protection and Safeguarding Policy.

Concerns or allegations can relate to behaviour inside or outside of work and do not have to directly involve children.

Allegation that meet threshold to refer to LADO

Where it is alleged that any adult:

- 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 indicates he or she 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.

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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.

If we’re in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

3. Definition of Low-Level Concerns

The term 'low-level' concern is any concern – no matter how small – 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 designated officer at the local authority

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

- Breaching confidentiality
- Being overly friendly with children/ failing to maintain professional boundaries
- 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
- Inappropriate language

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.

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.

4. Sharing Low-Level Concerns

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. This is made clear in our Code of Conduct.
- 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

A member of staff who has a concern about another member of staff should inform headteacher/DSLs (central managers for central staff) about their concern. If Senior

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leaders/DSLs cannot be contacted, the CEO, or member of the executive team, should be contacted instead.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

5. Responding to Low Level Concerns

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 or Trust from becoming the subject of potential false low-level concerns or misunderstandings.

If the concern is raised via a third party, the headteacher/ senior manager 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/ senior manager will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's Code of Conduct and HR policies, in consultation with HR. Any investigation into behaviour will be done in line with the appropriate HR policy.

Records are reviewed by the headteacher/ senior manager regularly so that potential patterns of inappropriate, problematic or concerning behaviour can be identified.

6. Storing and use of Low-level Concerns and Follow-up Information

All low-level concerns will be recorded in writing by the person reporting the concern. In schools these concerns will be typically raised via Staff Safe but can also be made using the template in Appendix 1.

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.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR (e.g. using Staff Safe). The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the headteacher or those aware in the senior leadership team.
- 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 harm threshold we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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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.

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 that would ordinarily be included in a reference, such as misconduct or poor performance

Whenever staff leave TOP, 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.

Appendix 1 – Low-level Concern Form

Please use this form to share 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 the values of The Oak Partnership, 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

Where possible, speak with the Headteacher/DSL as soon as possible. It is also helpful to document your concerns, which can be done using this form and passed to the Headteacher/DSL. If the concern is about the Headteacher, please pass on to Chair of LSC.

(Remember – a low-level concern is different to an allegation and should use a different policy)

Name:
Signed:
Date