

South Farnborough Infant School

Low-Level Concerns Policy



Date of policy: November 2025

Review of policy: November 2026

Person responsible: Danielle Duffy

Presented to staff and governors: November 2025

1. Introduction

At South Farnborough Infant School, the safety and wellbeing of our children is a key priority. 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. The term *staff* throughout this policy refers to leaders, teachers, support staff, supply teachers, volunteers, Local Authority visiting staff and contractors.

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 person who has a concern about a member of staff or volunteer should inform the **Head Teacher/DDSL** (Danielle Duffy), **Assistant Head Teacher/DSL** (Carolyn Lidington) or **DDSL** (Danni Deans) about their concern, either verbally or in writing.

3. Policy aims

- To help create a culture in which all concerns about adults are shared responsibly and with the right person and are recorded and dealt with appropriately.
- To enable the school to identify concerning, problematic or inappropriate behaviour early.
- To minimise the risk of abuse occurring.
- To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.
- To help create an environment where staff are comfortable 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.

4. Keeping Children Safe in Education (KCSiE)

The following is taken from Keeping Children Safe in Education (KCSiE) September 2025:

Low-level concerns

425. 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.

426. 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 is a low-level concern?

427. 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.

428. 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.

429. 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.

430. 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.

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

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; 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 they 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.

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

'Spectrum of behaviour'

Taken from: 'Developing and implementing a low-level concerns policy: A guide for organisations which work with children' Farrer & Co, Sept 2021

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

LLC correspondence and follow-up information will be stored securely within the school's safeguarding systems, with access only by the DSL/DDSLS. 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 nominated member of the Senior Leadership Team.

Low-Level Concerns will not be referred to in employment references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever a member of staff leaves South Farnborough Infant 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 retained on file. 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.

7. Low-Level Concern Procedure

Staff should inform the DSL or DDSLS if they have any concern – no matter how small, and 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 South Farnborough Infant School staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

The person raising the concern should provide a concise record – including chronological details of the concern, a brief context in which the low-level concern arose, any further information which is as precise and accurate as possible – of any such concern and relevant incident(s).

How SFIS will handle the matter

Once we have been informed of a concern, we will look into it carefully and thoroughly to assess what action, if any, should be taken. Depending on the nature of the concern, this may mean an internal inquiry or a more formal investigation. We may ask the person who raised the concern how they think the concern should be dealt with. If they have a personal interest in the matter, we would ask that this is declared at the outset. Whilst we will try to give as much feedback as possible, we may not be able to give all specific details as this could infringe the privacy of another individual. We cannot guarantee to respond to all concerns in the way that individuals might wish, but will try to handle the matter fairly and properly.