LOW LEVEL CONCERNS PROCEDURE

1. Purpose

This procedure sets out how the school responds to low-level concerns regarding the behaviour of adults working in or on behalf of the school. It supports a culture of openness and transparency and ensures that concerns are addressed early, proportionately and consistently, in line with Keeping Children Safe in Education (KCSIE) and the school's safeguarding and disciplinary policies.

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2. What is a Low-Level Concern?

A *low-level concern* is any concern – no matter how small, and even if no more than 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 harm threshold or require referral to the Local Authority Designated Officer (LADO).

Low-level concerns may arise from observation, disclosure, complaint, third-party information or self-reporting.

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3. Reporting a Low-Level Concern

- All staff, volunteers and contractors are encouraged to share low-level concerns promptly.
- Concerns must be reported to the Headteacher.
- Where the concern relates to the Headteacher, it must be reported to the Chair of Governors.
- Staff may also self-report where they believe their own actions could be misinterpreted or fall below expected standards.

Raising a low-level concern is considered a neutral and protective act and will not, in itself, result in disciplinary action.

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4. Initial Consideration and Action

The Headteacher (or Chair of Governors where appropriate) will:

- gather sufficient information to understand the nature of the concern;
- consider whether the concern remains low-level or requires escalation;
- determine proportionate next steps, which may include advice, clarification of expectations, support, training or informal management action;
- record the concern, decision-making and rationale.

Where there is any uncertainty, advice will be sought from the **LADO**.

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5. Recording and Storage

- All low-level concerns will be recorded and stored securely.
- Records will be kept separately from personnel files and shared only on a strict need-to-know basis.
- Records will be reviewed regularly to identify any emerging patterns of behaviour which may indicate increased risk and the need for escalation.

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6. Records of Action (ROAs)

- ROAs are used to record informal management discussions and are disposed of after six months in line with the school's Disciplinary Policy and Local Authority retention guidance.
- Low-level concerns are retained for longer to allow appropriate monitoring of behaviour over time.

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7. Retention of Low-Level Concerns

Low-level safeguarding concerns records will be retained:

- until the individual leaves the school's employment, and
- for a period of six years thereafter.

Records may be securely destroyed earlier where, following review, they are no longer assessed as necessary or proportionate for safeguarding purposes.

Where a low-level concern escalates or contributes to an allegation that meets the harm threshold, records will be managed in line with the school's Managing Allegations procedures, including liaison with the LADO.

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8. Review and Oversight

This procedure is reviewed in September alongside the Child Protection and Safeguarding Policy to ensure continued compliance with statutory guidance and local authority requirements.