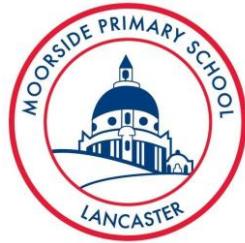


Moorside Primary School	
<b>Document Name</b>	Low Level Concerns Policy
<b>Date</b>	September 2025
<b>Version</b>	2
<b>Audience</b>	Staff
<b>Approved by</b>	Governing Body



## 1. Introduction

At Moorside Primary School, we 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, including the Staff Code of Conduct.

The purpose of the policy is to create and embed a culture of openness, trust and transparency and to support the values laid out in the Code of Conduct. Its aim is to empower staff to show concerns and strength the school's overall approach to safeguarding.

This policy sets out the detail and processes **for staff** regarding low-level concerns they may have other staff members.

## 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 Headteacher about their concern using a Low-Level Record of Concern Form. If the Head teacher cannot be contacted, the Deputy Head should be contacted instead. If the concern is about the Headteacher, contact the Chair of Governors.

## 3. Keeping Children Safe in Education September 2025

The following is taken from Keeping Children Safe in Education September 2025

152. Governing bodies and proprietors should ensure there are procedures in place as described in paragraph 69 - 71, to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold, about staff members (including supply staff, volunteers, and contractors).

153. Governing bodies and proprietors should ensure there are procedures in place, as described in paragraphs 69 - 71, for staff to report concerns or allegations that may meet the harm threshold about staff members (including supply staff, 43 volunteers, and contractors).

The school aims to achieve the overarching goal of keeping children safe by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised
- and by identifying any weakness in the school safeguarding system.

#### **What is a low level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm set out below. 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 allegations threshold or is otherwise not considered 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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive 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.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and 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 potential false allegations or misunderstandings.

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

##### Allegation

**Behaviour which indicates that an adult who works with children has:**

- behaved in such a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

##### Low-Level Concern

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 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.

#### 5. What to do if you have a low level concern

If you have a low-level concern about a member of staff, supply staff, volunteer, student or contractor (including third party provider), **report this to the Headteacher** at the earliest opportunity. They will follow the school’s procedure for responding to concerns about the conduct of adults associated with school. If your **concern is about the Headteacher**, contact the Chair of Governors ([e.cookson@moorside-pri.lancs.sch.uk](mailto:e.cookson@moorside-pri.lancs.sch.uk)). If a staff member feels unable to raise an issue with the Headteacher or Chair of Governors, they should access other **whistleblowing channels** such as the NSPCC whistleblowing helpline (0800 028 0285). Appendix 1 (below) provides details of how the Headteacher should respond once they have received a concern.

There may occasions where a **member of staff needs to ‘self-report’** as they are aware that their behaviour might be open to misinterpretation, that they think they might have breached the code of conduct or have handled a situation in a certain way, which, on reflection could have been dealt with differently. Self-reporting is seen as an important part of an open working culture where staff have high expectations of their own conduct.

#### 6. Storing and use of Low-Level Concerns Information

LLC forms and follow-up information will be stored securely within the schools safeguarding systems, with access only by the Headteacher or someone deputising for them. 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 Moorside, 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 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.

All low-level concern records for an individual will be deleted within six years of that individual leaving the school.

## **Appendix 1**

### **Responding to a Concern Relating the Conduct of Adults in School**

#### **(Based on Allegations Against Staff or Volunteers, CSAP)**

1. The person with the concern should report it to the Headteacher at the earliest opportunity. They should make a written record of the details shared, including:

- the date the concern was raised
- the date and time of the incident or the dates/time period if the concern is about a pattern of behaviour
- the context

2. Depending upon the nature of the concern, it may be necessary for the Headteacher to contact the LADO for advice to ensure that the incident or behaviour is a 'concern' rather than allegation which might have placed a child at risk of harm.

3. The Headteacher should gather as much evidence as possible through talking to any witnesses. (unless they have been advised not to do so by the LADO).

4. The Headteacher should talk to the individual about whom the low-level concern has been raised (unless they have been advised not to do so by the LADO).

5. Once gathered, the information should be reviewed to determine if the behaviour:

- is in fact appropriate and consistent with the staff code of conduct and the law
- constitutes a low-level concern

-there is any doubt about as to whether the information which has been shared about a member of staff as a low-level concern in fact may meet the threshold for harm, in which case the Headteacher should consult with the LADO

-in and of itself the behaviour may meet the threshold for harm

-when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies,

All information will be recorded in writing, along with the rationale for any decisions and action taken.

6. Where the concern involves a contractor or agency worker, then the concern will be shared with their employer.

7. The number of low-level concerns in any one year is reported to governors to allow them to carry out their monitoring and strategic overview of safeguarding.