

Langley Primary School

Low-Level Concerns Policy (Safeguarding Policy Amendment)

Introduction

This policy addresses concerns about adults working in or on behalf of Langley Primary School that do not meet the harm threshold as defined in Part 4 of *Keeping Children Safe in Education* (2026). It applies to all staff, including supply teachers, volunteers, and contractors.

We recognise the importance of timely response to any concerns to safeguard the welfare of our children and uphold our school values of care, respect, and a safe learning environment.

Definition of Low-Level Concerns

A *low-level concern* is any concern—no matter how small or seemingly insignificant—that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Langley Primary School staff Code of Conduct, including inappropriate conduct outside of work, and
- Does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Examples include but are not limited to:

- Being overly friendly with children
 - Showing favourites
 - Taking photographs of children on personal mobile devices contrary to school policy
 - Often engaging with a child one-to-one in a secluded area or behind a closed door
 - Using inappropriate or offensive language
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Sharing Low-Level Concerns

Langley Primary School is committed to fostering a culture of openness, trust, and transparency. This encourages all staff to share low-level concerns promptly so they can be addressed appropriately. We will:

- Ensure staff understand what constitutes appropriate behaviour and can distinguish it from concerning or inappropriate behaviour.
 - Maintain clear policies and procedures reflecting our school ethos of respect, democracy, and care.
 - Empower staff to share concerns and self-refer without fear of reprisal.
 - Address unprofessional behaviour early and support corrective action.
 - Respond sensitively and proportionately to concerns raised.
 - Use concerns to identify and strengthen any weaknesses in safeguarding systems.
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Reporting a Low-Level Concern

- All low-level concerns should be reported to the Headteacher (Mr Peter Higgins) following the school's Child Protection procedures.
 - Concerns about the Headteacher should be reported to the Chair of Governors (Siobhan Francis).
 - Concerns about supply staff, contractors, or local authority staff should also be reported to their employers.
 - Staff should use the school's Low-Level Concerns Reporting Form (Appendix 1) for documentation.
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Responding to Low-Level Concerns

When a concern is raised, the Headteacher will:

- Collect information by speaking to the person raising the concern (unless anonymous), the individual involved, and any witnesses.
 - Categorise the behaviour and decide on further action in line with the school's Code of Conduct.
 - Refer allegations meeting the harm threshold to the LADO.
 - Seek LADO advice for concerns needing further guidance.
 - Manage concerns that can be dealt with internally through the usual child protection investigation process.
 - Engage with the HR provider for further investigation or disciplinary procedures as necessary.
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Record Keeping

Records of low-level concerns will:

- Be kept in writing, including details of the concern, context, actions taken, and rationale.

- Be confidential, stored securely on DSL area on google drive, and comply with Data Protection Act 2018 and UK GDPR.
 - Be reviewed regularly to identify any patterns of inappropriate behaviour.
 - Trigger disciplinary action or referral to the LADO if a pattern meets the harm threshold.
 - Be retained at least until the individual leaves the school's employment.
 - For supply staff or contractors, the individual's employer will be notified to monitor patterns.
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Reviewing Low-Level Concerns

The Headteacher will review records to identify patterns of behaviour that may require:

- Disciplinary investigation or proceedings.
 - Management advice or targeted training.
 - Referral to the LADO if behaviour escalates to meet the harm threshold.
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References

Low-level concerns will not be included in references unless:

- The concern(s) met the threshold for referral to the LADO and was substantiated.
- The concern(s) relate to issues normally included in references, such as misconduct or poor performance.

Appendices

Appendix 1: Low-Level Concern Reporting Form

Details of Concern
Name of staff member involved:
Team & Role:
Date of concern:
Description of concern and context (chronological and precise):
Name of person reporting (optional):
Signature:
Date:

Statutory Guidance Extract from *Keeping Children Safe in Education* (2025)

- All low-level concerns should be recorded in writing, including details of the concern, context, action taken, and the name of the individual sharing the concern unless anonymity is requested (paras 441-442).
 - Records must be confidential, securely held, compliant with Data Protection Act 2018 and UK GDPR, and reviewed to identify patterns of concerning behaviour (paras 442-443).
 - Where patterns escalate to meet the harm threshold, referral to the LADO is required (para 443).
 - Records should be retained at least until employment ends (para 444).
 - Low-level concerns should only be included in references if they relate to substantiated safeguarding allegations or misconduct/performance issues (para 445).
 - Procedures for responding to low-level concerns include gathering evidence from relevant parties and recording decisions and rationale (paras 446-447).
 - A good low-level concerns policy reflects and extends the wider staff behaviour policy/code of conduct (para 448).
 - Schools should promote a culture of openness and transparency to share concerns responsibly and appropriately (paras 428-429).
 - Low-level concerns can arise from suspicion, complaints, disclosures, or vetting checks (para 432).
 - The purpose of the policy is to embed a culture of openness, trust, and transparency aligned with the school's values and expected behaviours (para 434).
 - Schools must ensure staff understand appropriate behaviour and are confident in distinguishing it from problematic behaviour, empowering staff to share concerns and addressing unprofessional behaviour early (para 436).
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