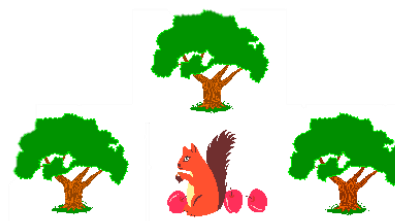


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# LOW-LEVEL CONCERNS

## Policy and Procedure

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### Introduction

Our school is committed to creating a culture of openness, trust and transparency, where all staff feel confident to share even the smallest concerns. We recognise that while some matters will not meet the threshold for a formal safeguarding response, all concerns matter. When noticed and recorded, low-level concerns can help us build a fuller picture and act early to protect children's safety and wellbeing.

Our safeguarding practice is always guided by *Keeping Children Safe in Education* (KCSIE) and supported by our Safeguarding and Whistleblowing policies. This policy complements those documents by setting out how low-level concerns should be recognised, shared and recorded, and how they may be considered in consultation with the Local Authority Designated Officer (LADO).

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### What is a Low-Level Concern?

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate behaviour outside of work, and
- does not meet the threshold for an allegation following consultation with the LADO.

Low-level concerns might arise from a suspicion, a complaint, a safeguarding concern or allegation from another member of staff, a disclosure made by a child, parent or other adult, or from information that comes to light through pre-employment vetting checks.

Examples could include:

- being over-friendly with children
- having favourites
- taking photographs of children on a personal mobile phone
- engaging with a child one-to-one in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language

We recognise the importance of noticing, sharing and responding to such concerns promptly, so that children's welfare remains at the centre of our practice.

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## Sharing Concerns

We encourage all staff to share low-level concerns confidentially, knowing they will be handled fairly, sensitively and proportionately. Creating a culture where staff feel able to do this helps us to safeguard children and support colleagues.

We do this by:

- ensuring staff are clear about what constitutes appropriate behaviour, and confident in distinguishing it from concerning or inappropriate conduct, in themselves and others
  - empowering staff to share any low-level concerns in line with this policy
  - encouraging staff to self-refer if they are worried about their own conduct
  - addressing unprofessional behaviour early and supporting staff to correct it
  - handling concerns in a timely, measured and supportive way
  - reviewing concerns to help identify any weaknesses in our safeguarding systems
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## Responding to Low-Level Concerns

Any member of staff who becomes aware of a low-level concern must inform the Headteacher immediately. This includes concerns relating to agency staff, as well as volunteers.

Where the concern relates to the Headteacher, this should be reported directly to the Chair of Governors. If this is not possible, staff should consult directly with the LADO.

The Headteacher or Chair of Governors will seek advice from the LADO within one working day. Staff should not undertake further investigations before advice has been sought.

Any member of staff or volunteer who does not feel able to raise concerns internally may contact the LADO directly:

- **Phone:** 020 8496 3646
  - **Email:** lado@walthamforest.gov.uk
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## Record Keeping

All low-level concerns will be recorded on the Ainslie Wood StaffSafe system. Records will include details of the concern, the context in which it arose, the action taken, and the rationale for decisions made.

Records will be:

- kept confidential, held securely, and compliant with the Data Protection Act 2018 and UK GDPR
- reviewed regularly so that any patterns of concerning or inappropriate behaviour can be identified
- retained for the duration of the individual's employment at the school

Where concerns suggest a potential pattern of behaviour, we will consider appropriate action under our disciplinary procedures or, where the threshold of harm/risk of harm may be met, refer the matter to the LADO.

If a low-level concern involves an agency worker or contractor, we will notify their employer so that patterns of behaviour can be monitored.

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## References

Low-level concerns will not normally be included in references. They will only be included if:

- the concern (or group of concerns) has met the harm/risk of harm threshold, warranted LADO oversight, and has been 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.